

## Commentor No. 420: Brad Evans

## Response to Commentor No. 420

### Draft PEIS Comment Form

The evidence provided by the PEIS strongly supports the selection of Alternative #1, restart of the FFTE to support the three missions:

- medical isotopes
- nuclear technology advancement
- production of Pu-238

Please do not allow the politics of fear and ignorance dictate a decision to <sup>permanently</sup> shut down FFTE and compromise our ability to fulfill these important objectives, especially medical isotope production.

Please exhibit foresight and courage in doing the right thing and restart FFTE.

Thank-you.

420-1

420-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Brad Evans

Organization: Self

Home/Organization Address (circle one): 1222 N. Shepard St.

City: Kennecott State: WA Zip Code: 99336

Telephone (optional): (509) 372-2744 (work) 783-7356 (home)

E-mail (optional): bdevans@integrityonline.com

**COMMENTS MUST BE POSTMARKED BY September 11, 2000**

For more information contact: Colette E. Brown, NE-SO  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

# Commentor No. 421: Monte Bemham

## Draft PEIS Comment Form

① The report must include the importance of providing a back up method of producing medical isotopes

The AEC provided backup facilities to ~~plants~~ such as: Oak Ridge & Hanford  
Sevastopol River & Hanford.

Commercial Aircraft provide safety back up systems - a backup to produce medical isotopes

② The report should clearly state that restart of FFE will benefit everyone - even opponent will benefit when they are diagnosed with cancer.

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- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Monte Bemham

Organization: Candidate State Rep 8<sup>th</sup> Leg Dist. Texas

Home/Organization Address (circle one):

5312 W TUCANNAN

City: KEMMERWILK

State: WA

Zip Code: 99336

Telephone (optional): 509 783 3824

E-mail (optional): rmondeb@aol.com

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19001 Germantown Road • Germantown, MD 20874  
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592  
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

# Response to Commentor No. 421

421-1

421-1: DOE notes the commentor's views regarding the need to provide backup production capacity for medical isotopes. The medical and industrial isotope production mission considered as part of this NI PEIS fulfills this need. As stated in Section 1.2.1 of Volume 1, nearly 50 percent of DOE's isotope production capacity is being utilized with the remaining capacity dispersed throughout the DOE complex and not readily available due to existing operating constraints. While other facilities exist to produce medical isotopes, many are dedicated to existing missions, as outlined in Section 2.6.1 of Volume 1. The selection of the preferred alternative in this NI PEIS will enable DOE to meet its program objectives for medical isotope production.

421-2

421-2: While this NI PEIS includes consideration of the alternative that would best enable DOE to meet its responsibilities under the Atomic Energy Act to provide isotopes for medical, industrial, and research applications, it is beyond the scope of this NI PEIS to specifically consider the benefits to individual persons or groups.

Commentor No. 422: Bernice C. Mitchell

Response to Commentor No. 422

Draft PEIS Comment Form

August 31, 2000  
 To: Collette Brown  
 From: Bernice C. Mitchell  
 After talking to some people today at  
 the yard and not being able to talk to some  
 others - some other people like Mr. Davis. I now  
 see keeping EFTF as another DOE award/  
 trophy for BNW in what seems a long  
 time for DOE's partnering with Congress  
 and the Senate to assist BNW to conquer  
 the business and educational worlds, while  
 we attend hearings etc., and watching notes  
 and Ted Turner and the others. In short, this  
 hearing is and was in justice and  
 national life are an "Inevitable Evil!!" BNW can  
 take their time and go home anytime.  
 I withdraw my previous request I sent to  
 Collette Brown that mail. See attachment  
 PS "Slade Barton is not working for me."

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 PEIS. These include:

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Bernice C. Mitchell

Organization: N/A

Home/Organization Address (circle one): 115 Spring Street

City: Richmond State: VA Zip Code: 22135

Telephone (optional):

E-mail (optional):

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Collette E. Brown, NE-50  
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
 Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592  
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



422-1

422-1: DOE notes the commentor's views and request to withdraw the  
 previously submitted letter (dated August 2, 2000).

## Commentor No. 423: John Fialkovich

### Draft PEIS Comment Form

*I fully support restart of the FFTF.*

423-1

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): John Fialkovich

Organization: Self

Home/Organization Address (circle one): 153 Bremner

City: Richland State: WA Zip Code: 99352

Telephone (optional): (509) 376-4000

E-mail (optional): \_\_\_\_\_

**COMMENTS MUST BE POSTMARKED BY September 18, 2000**

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Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

## Response to Commentor No. 423

423-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 424: Corky Greenfield

Response to Commentor No. 424

Draft PEIS Comment Form

The preferred alternative should be starting of the FFTF. I am a cancer survivor. I want the DOE to understand and appreciate the emotional and physical tribulations to which cancer patients are subjected. Some medical isotopes are in short supply, so patients may not be able to obtain treatment until it is too late. Some isotopes are so unavailable that research cannot practically be conducted although potential cures are promising. The Government should consider medical applications and the relief of human suffering as well as just the raw financial analysis. The cost of operating the FFTF for diagnostics and treatment is a small price to pay for the benefits.

424-1

424-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Corky Greenfield

Organization: \_\_\_\_\_

Home/Organization Address (circle one): PO Box 3093

City: Richland State: WA Zip Code: 99352

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

COMMENTS MUST BE POSTMARKED BY September 18, 2000

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Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



## *Commentor No. 425: Debbie Nielsen*

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Good evening, my name is Debbie Nielsen and I represent myself. My family and I have lived in the shadow of Hanford for more than 23 years. From our property, we look out over the Site and see the white dome and cooling towers of FFTF in the distance. This sight does not fill me with fear or apprehension for my family. My husband and I have raised 8 children in West Richland and I believe my community is a safe and wonderful place to live and for kids to grow up. As a matter of fact, when I look at FFTF I feel an enormous sense of pride and accomplishment.

I've been an engineer at FFTF for more than 15 years and I know what an outstanding and safe reactor this is. FFTF is DOE's largest and newest reactor complex which has received numerous awards recognizing its performance and impeccable safety record during its 10 year operating history. I would like to take a few minutes to share a few of my views with you.

First, I would like to thank the DOE for considering restart of the FFTF to support the important missions being discussed here tonight, in particular the production of medical isotopes. Having survived cancer myself, I know the devastation that comes with being diagnosed with cancer and the horrible impact that it has on your family. My cancer was removed in two painful, invasive procedures, but it hasn't returned. I was lucky. But many others aren't so fortunate. According to the American Cancer Society, this year about 552,000 Americans are expected to die of cancer, more than 1,500 people a day. Unfortunately, nearly everyone in this room tonight will experience the pain cancer will inflict to you, a loved one or a friend.

There is hope available, if we only decide to move forward and develop it. Recent advancements in the field of nuclear medicine have dramatically opened a whole new dimension in cancer treatment by being able to target isotopes directly to unwanted cancer cells without damaging healthy ones. Sadly though, these treatments are only available for a select few because of the severely limited supply. I firmly believe the DOE should expand the nuclear infrastructure by restarting FFTF to provide physicians and

425-1

## *Response to Commentor No. 425*

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425-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

**Commentor No. 425: Debbie Nielsen (Cont'd)**

researchers with a stable, large, and varied isotope supply to help this country in its battle against cancer.

FFTF stands out above the other alternatives evaluated in the PEIS both in its flexibility and capability to support DOE's objectives. As a matter of fact, I believe one thing missing in the PEIS is a capabilities assessment. Right now it is difficult for someone not technically familiar with these alternatives to recognize that the options vary greatly in their capability to meet the mission needs. I am sure that if the Department of Energy completes a capabilities comparison, coupled with the results of the PEIS, cost study, and nonproliferation report, they will come to the same conclusion that I have.

I know there are concerns about wastes that would be generated and the possible impacts of FFTF operation on the environment and current cleanup activities at Hanford. I want to see Hanford cleaned up too. I've been involved in environmental compliance and safety at FFTF for many years so I was not surprised that the PEIS indicated impacts of FFTF operation are extremely small. I know that FFTF operation does not pose a threat to the public or the environment. I would never support restart if I believed the reactor posed a danger to my family or community.

However, I believe it is important to recognize that there are some significant impacts that would occur by selecting FFTF. These impacts will manifest themselves in tremendous humanitarian benefits to the people in this country. The medical isotopes FFTF could produce would dramatically alter the course of cancer treatment, and provide hope and low cost care to millions of suffering Americans. I have complete confidence in the skill and competence of the staff at FFTF and the quality of the facility itself to safely and effectively meet these missions. I fervently hope that the DOE won't allow the anti nuclear sentiment and unfounded fear of a few vocal activists in this region to force shutdown of this important national asset. During my talk alone tonight, 5 more Americans have died of cancer. It is critical that the upcoming decision be based on facts, not fiction.

425-1  
(Cont'd)

425-2

425-3

425-1

**Response to Commentor No. 425**

- 425-2:** The comment with respect to the need for a capabilities assessment of NI PEIS alternatives is noted. Volume 1, Section 2.7.1.2.3 of the Draft NI PEIS presents a comparison of mission effectiveness among alternatives. This section has been revised in the Final NI PEIS (see Section 2.7.1.8, "Comparison of Mission Effectiveness Among Alternatives") to provide the reader a better understanding of the medical isotopes that can be produced using accelerator technology (Alternative 3) and reactor technology alternatives (Alternatives 1 and 4).
- 425-3:** DOE notes the commentor's support for Alternative I, restart of FFTF. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram funds designated for Hanford cleanup, regardless of the alternative(s) selected.

## Commentor No. 426: Dennis A. Fitzgerald

Dennis A. Fitzgerald  
4301 English court  
West Richland WA 99353  
(509) 627-0936 Fax: (509) 627-2413  
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*"One voice, one perspective from life in the trenches of America"*

August 31, 2000

Page 1

Public hearing on the Nuclear Infrastructure PEIS  
Tower Inn, Richland, Washington

Good Evening, Ladies and Gentlemen.

My name is Dennis Fitzgerald. Tonight I represent the West Richland Chamber of Commerce. I also desire to speak on behalf of my fellow cancer FIGHTERS.

I wish for no one to "walk a mile in the moccasins" of a cancer FIGHTER. However, if one wants a sense of what it is like, read Chapter Six of Lance Armstrong's book, "It is Not About the Bike, My Journey Back to Life". Or read "The Warrior's Way", by John R. Cope from Lake Oswego, Oregon, a four-time breast cancer survivor. (Men get 1 ½% of all breast cancers.) Or talk to the parents and grandparents of my nine-year old fellow cancer FIGHTER Larry, who after a bone transplant in his leg, has eight months to go in his year of hard chemo treatment. They can give you a sense of what it is like to care for a child with cancer.

In Mr. Cope's book he states, "Three words will change your life forever, 'YOU HAVE CANCER'. It will affect your loved ones, too. Mr. Armstrong writes, "I never thought I knew what fear was until I heard the words, 'YOU HAVE CANCER'". Mr. Armstrong, the recent two-time winner of the Tour de France, had testicular cancer, which in a short time spread to his lungs, then to his brain. That is why early detection is so important.

Latest input from the American Cancer Society predicts that in one's lifetime for women, one in three will get cancer, one in eight will get breast cancer. For men, one in two will get cancer, one in six will get prostate cancer. **These odds are the same whether you are for or against the restart of FFTF**

- For you ladies, if you did get breast cancer, would you prefer a medical isotope "smart bullet" that would attack only the cancer, or prefer surgery that may disfigure you, followed by hard chemo that will leave you temporarily bald?
- For you men, if you did get prostate cancer would you prefer outpatient implant of medical isotope seeds, or surgery with almost a week of hospitalization, follow by several weeks of home recovery with a catheter in your bladder? Plus being at equal or higher risk of permanent impotence or incontinence, or both.
- You could be one of the eight million suffers of rheumatoid arthritis in our country and the doctor told you medical isotopes would help, but you have to go to Europe for treatment.

## Response to Commentor No. 426



## Commentor No. 426: Dennis A. Fitzgerald (Cont'd)

Dennis A. Fitzgerald  
4301 English court  
West Richland WA 99353  
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E-mail: [Fromthetrenches@aol.com](mailto:Fromthetrenches@aol.com)

August 31, 2000

Page 2

### Public hearing on the Nuclear Infrastructure PEIS Tower Inn, Richland, Washington

What if the doctor told you medical isotopes would be the best treatment you. However due to shortages, causing delays in clinical trials or in general supply the desired isotopes are not available to you now, but the doctor will put you on a waiting list. Since we import 90% of our isotopes these are real scenarios

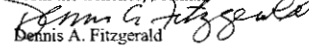
Let us talk about what I call emotional uncertainties or perhaps fears and seek to overcome them with facts.

- Operating FFTF will come from separate funds than Hanford clean up funds. In fact **shutting down FFTF will add \$281.2 million** to the existing clean up budget burden.
- No existing accelerators in the western hemisphere can compete in variety, quantity and purity of the FFTF an existing facility in which you and I as taxpayers have already invested millions and millions and millions of dollars. Reportedly a high-energy accelerator may come close to matching the FFTF but it does not yet exist and will require years and more millions of our tax dollars to bring on line.

Unfortunately cancer does not wait. It is like our recent Twin Forks Fire. While the bureaucrats and political entities were "fiddling" over how to control the fire, the fire raged out of control, eventually burning over 300 square miles. While the bureaucrats and politicians have been pondering the fate of the FFTF for too many years now, thousands of our fellow citizens have died an early death and many, many thousands more have had to endure prolong suffering. Why? Because our government has no effective strategy or programs in place to meet the medical isotope needs of our people. That includes the present and future medical isotope needs of everyone of us in this meeting tonight, plus our family, friends and neighbors.

The bottom line is this: Medical isotopes offer a kinder and gentler treatment for an expanding array of cancer types and an easier and longer "walk in the moccasins" for the cancer FIGHTER. For the health of our nation that is the case for the for restart of FFTF.

From the trenches, I remain,

  
Dennis A. Fitzgerald  
Citizen  
Cancer FIGHTER  
Member, West Richland Chamber of Commerce

CC: West Richland Chamber of Commerce  
Citizens for Medical Isotopes (CMI)

## Response to Commentor No. 426

426-1

426-1: DOE notes the commentor's support for Alternative 1, Restart FFTF, and opposition to Alternative 3, Construct New Accelerator(s).

426-2

426-2: See response to comment 426-1. A combination of low energy and high energy accelerators can meet mission objectives although they might not be able to do some research and development that requires fast neutrons or liquid metal loops. The reference accelerator design is mature and DOE has considerable experience in designing and building such accelerators.

426-1

**Commentor No. 427: Susan Carlstrom  
UFCW Local 141**

**Draft PEIS Comment Form**

See Attached

United Food & Commercial Workers Local 141  
United Staff Nurses Union and United  
Food & Commercial Workers Local 1439  
Stand in Support of Medical Isotope  
Production for Cancer Research and  
Cancer Treatment. We also support the  
restart of the FFTE for this purpose.  
We understand that the use of medical  
isotopes is a more humane way of  
treating people with cancer diagnosis  
with less side effects than the  
traditional treatments of chemotherapy  
or radiation therapy. As registered nurses  
we advocate for patients and daily basis we  
care for patients with cancer diagnosis  
and see first hand the pain & suffering  
that these persons must endure not only from  
their cancer but from the side effects of their  
treatments. It is for this reason we  
encourage the DOE to consider restart of FFTE  
for the production of medical isotopes for cancer  
research. There are several ways to provide comments on the Nuclear Infrastructure research  
PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Susan Carlstrom Vice President

Organization: UFCW Local 141

Home Organization Address (circle one): 5117 W. 4th Ave  
Kennewick, WA 99336

City: Kennewick State: WA Zip Code: 99336

Telephone (optional): \_\_\_\_\_

E-mail (optional): scarlstrom@aol.com

**COMMENTS MUST BE POSTMARKED BY September 18, 2000**

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NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



**Response to Commentor No. 427**

427-1

427-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

**Commentor No. 427: Susan Carlstrom (Cont'd)**  
**UFCW Local 141**

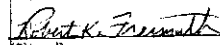
**Response to Commentor No. 427**

FROM : ROBERT WILKINSON  
07/28/00 16:50 FAX 5099160905  
FAX NO. : 509 735 4992  
HEASTON VISION C  
Aug. 23 2000 09:23AM P2  
002

**Support of Medical Isotope Production  
at the Fast Flux Test Facility**

- Whereas, One in three Americans are touched by cancer, and
- Whereas, The use of medical isotopes in the treatment of cancer and heart disease is showing very encouraging and dramatic results. These new treatments use radioisotopes targeted specifically to the diseased cells and minimize the damage to healthy cells. The cost of medical isotope treatment is often much less than conventional treatments and with less debilitating results; and
- Whereas, Serious concern exists in the scientific and medical professions that the United States does not have the capability to produce enough radioisotopes to meet the rapidly increasing demand, while we depend on foreign supplies as over 90% of the isotopes currently used are imported, and
- Whereas, Private companies that develop new cancer treatments hesitate to invest millions of research dollars up front when the isotopes they want to use may not be reliably available, and
- Whereas, The existing Fast Flux Test Facility (FFTF) can reliably produce a diverse selection and large quantities of high quality isotopes; and
- Whereas, The FFTF is a significant national asset as it is the Department of Energy's newest and most sophisticated nuclear reactor with the potential to play a major role in supporting critical national missions such as medical isotope production for treatments of disease, non-proliferation fuels testing, research associated with the transmutation of nuclear waste, NASA space mission energy needs, and other scientific research; and
- Whereas, The United States has an aging and diminishing reactor inventory for scientific research and testing, while at the same time the United States is experiencing an increasing demand for the production of isotopes for medical and industrial applications; therefore

BE IT RESOLVED that the ~~UFCW Local 141~~ support a restart of the Fast Flux Test Facility to serve as a multi-mission research and isotope production reactor.

  
(Signed)

8-23-00  
(Date)

**Commentor No. 427: Susan Carlstrom (Cont'd)**  
**UFCW Local 141**

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**Support of Medical Isotope Production  
 at the Fast Flux Test Facility**

- Whereas, One in three Americans are touched by cancer, and
- Whereas, The use of medical isotopes in the treatment of cancer and heart disease is showing very encouraging and dramatic results. These new treatments use radioisotopes targeted specifically to the diseased cells and minimize the damage to healthy cells. The cost of medical isotope treatment is often much less than conventional treatments and with less debilitating results; and
- Whereas, Serious concern exists in the scientific and medical professions that the United States does not have the capability to produce enough radioisotopes to meet the rapidly increasing demand, while we depend on foreign supplies as over 90% of the isotopes currently used are imported, and
- Whereas, Private companies that develop new cancer treatments hesitate to invest millions of research dollars up front when the isotopes they want to use may not be reliably available, and
- Whereas, The existing Fast Flux Test Facility (FFTF) can reliably produce a diverse selection and large quantities of high quality isotopes; and
- Whereas, The FFTF is a significant national asset as it is the Department of Energy's newest and most sophisticated nuclear reactor with the potential to play a major role in supporting critical national missions such as medical isotope production for treatments of disease, non-proliferation fuels testing, research associated with the transmutation of nuclear waste, NASA space mission energy needs, and other scientific research; and
- Whereas, The United States has an aging and diminishing reactor inventory for scientific research and testing, while at the same time the United States is experiencing an increasing demand for the production of isotopes for medical and industrial applications; therefore

BE IT RESOLVED that the (UFCW Local 141) support a restart of the Fast Flux Test Facility to serve as a multi-mission research and isotope production reactor.

Marilyn Savage RN  
 (Signed) President

8-12-2000  
 (Date)

**Response to Commentor No. 427**

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**Commentor No. 427: Susan Carlstrom (Cont'd)**  
**UFCW Local 141**

AUG 28 '00 11:42AM B. F. HEALTH DEPT.

P.2/2

**Support of Medical Isotope Production  
 at the Fast Flux Test Facility**

- Whereas, One in three Americans are touched by cancer, and
- Whereas, The use of medical isotopes in the treatment of cancer and heart disease is showing very encouraging and dramatic results. These new treatments use radioisotopes targeted specifically to the diseased cells and minimize the damage to healthy cells. The cost of medical isotope treatment is often much less than conventional treatments and with less debilitating results; and
- Whereas, Serious concern exists in the scientific and medical professions that the United States does not have the capability to produce enough radioisotopes to meet the rapidly increasing demand, while we depend on foreign supplies as over 90% of the isotopes currently used are imported, and
- Whereas, Private companies that develop new cancer treatments hesitate to invest millions of research dollars up front when the isotopes they want to use may not be reliably available, and
- Whereas, The existing Fast Flux Test Facility (FFTF) can reliably produce a diverse selection and large quantities of high quality isotopes; and
- Whereas, The FFTF is a significant national asset as it is the Department of Energy's newest and most sophisticated nuclear reactor with the potential to play a major role in supporting critical national missions such as medical isotope production for treatments of disease, non-proliferation fuels testing, research associated with the transmutation of nuclear waste, NASA space mission energy needs, and other scientific research; and
- Whereas, The United States has an aging and diminishing reactor inventory for scientific research and testing, while at the same time the United States is experiencing an increasing demand for the production of isotopes for medical and industrial applications; therefore

BE IT RESOLVED that the (UFCW 1439) support a restart of the Fast Flux Test Facility to serve as a multi-mission research and isotope production reactor.

*[Signature]*  
 (Signed) UFCW 1439

8-28-2000  
 (Date)

**Response to Commentor No. 427**

## Commentor No. 428: Citizens for Medical Isotopes

### MEDICINE SAYS FAST FLUX TEST FACILITY GREATLY NEEDED

428-1

"The FFTF could play a very significant role in health care in the United States."

- DuPont Pharmaceuticals

"I believe our nuclear medicine/research programs are in great jeopardy."

- Thomas Maloney, President, Iso-Tex Diagnostics, Friendswood, Texas

"Without the availability of radioisotopes such as Cu-67, we will essentially be depriving the American public of a new drug that has already shown responses in cancer patients."

- Sally J. DeNardo, M.D., University of California, Davis

It is critical that FFTF be brought back on-line to ensure adequate supplies (of isotopes) for medical uses."

- Michael R. Henson, CEO, Radiance Medical Systems, Inc.

"Our research has been severely hampered over the years because the government has so poorly supported a strong isotope production program...We have had difficulty sustaining some of our research efforts because of a lack of radioisotope availability. . . We believe that FFTF should be restarted to help meet projected needs for many isotopes that (we would like to explore and develop into cancer treatments)."

- Robert M. Sharkey, Ph.D., Director of Clinical Research, Garden State Cancer Center

"We believe that FFTF is a valuable asset and consider the national interest better served by keeping the reactor in service."

- E. Allen Womack, Jr., BWX Technologies, Inc. Lynchburg, VA

"The field of therapeutic isotopes is just opening up and has tremendous potential for the future. However, this future will be heavily impacted by availability of ...these new isotopes at costs that basic research can afford."

- Victor J. Becker, Sr. Director – Operations, Diatide, Inc. (Developer of new diagnostic and therapeutic imaging agents)

## Response to Commentor No. 428

428-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

*Commentor No. 428: Citizens for Medical Isotopes (Cont'd)*

"The FFTF is a unique facility with capabilities...that no other device in the world can match. It also has an outstanding record of research, operational excellence, safety, and environmental stewardship. A reactor with the capabilities of the FFTF might never be built again."

- Wilson C. "Toby" Hayes, Vice Provost for Research, Oregon State University, Corvallis, OR

"I am writing to express my strong support for...the restart of the Fast Flux Test Facility (FFTF). I hope that the decision on its future will fully weigh its considerable merits and many prospective contributions to the nation's health and welfare."

- Manuel Martinez-Maldonado, M.D., Vice Provost for Research, Oregon Health Sciences University

"Immunomedics, Inc., is developing radiolabeled monoclonal antibodies as specific targeting agents for the treatment of human disease, particularly cancer...as we at Immunomedics work to make this promising technology a clinical reality...the major impediment to progress in this type of work is a steady reliable supply of promising new radioisotopes."

- Dr. Gary Griffiths, Director of Chemistry, Immunomedics, Inc.



*Citizens for Medical Isotopes: Benton-Franklin Title Bldg.  
3315 W. Clearwater, Kennewick, WA 99336  
(509) 737-8463 Fax: (509) 737-9524  
[www.medicalisotopes.org](http://www.medicalisotopes.org) e-mail: [cmi@owt.com](mailto:cmi@owt.com)*

*Response to Commentor No. 428*

## Commentor No. 428: Citizens for Medical Isotopes (Cont'd)

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### CAN YOU SAVE MY LIFE?

Medical Isotopes –new opportunities to survive and regain quality of life

*The following expressions of gratitude are made by cancer patients and their family members - father, mother, sister, cousin or they, themselves had a terminal disease and no hope of survival with standard treatments.*

#### Patients treated experimentally with medical isotopes for Carcinoid Cancer

“My cousin has been released from a prison of suffering and has once again joined in the world of the living...every person who faces a terminal disease should have the right to exhaust any and all medical treatment that could make the difference between life and death.”

*- December, 1999 letter to Dr. Lowell B. Anthony of  
Stanley S. Scott Cancer Center - Louisiana State University*

“Your ‘potion’ is an amazing thing: one might even say a thing of beauty; a work of nuclear art, even...her clinical response borders on the unbelievable...I can even begin to hope that this saga will have a happy ending. Whatever you guys are doing, you’re doing it right. From one deeply grateful husband.”

*-March, 1998 letter to Dr. Anthony*

“I truly believe that this is my best and only answer to the cancer. There have been no side effects – no hear loss, nausea, pain, nothing! This is by far the greatest thing I’ve heard of and I always looked forward to the 8 hour drive for my treatments because I knew they were working!”

*- 1998 handwritten letter*

“I appreciate very much not only what (this medical isotope treatment) has done to increase my life span but also appreciate your company for standing behind people like myself with no where else to go.”

*-1998 letter to Thomas Maloney of ISO-TEX Diagnostics*

“My dad was very depressed and despairing...We knew that the only standard options available would not arrest the progression of this disease. What a blessing it is that he happened onto this research project... I think I speak for the entire family when I say that this therapy has improved his emotional and mental well being as well as his overall physical health. You have given my father the gift of hope.”

*- Written by daughter of patient with carcinoid tumor of the thymus*

“My wife’s response to the (medical isotopes) has been nothing short of phenomenal! Her quality of life had fallen to near non-existence and I sensed that she was preparing to die... (After the medical isotopes infusions), the pain was completely gone...and the wheelchair was collecting dust. You are the people who gave me this additional time with my beloved wife. For that, sir, I shall be eternally grateful.”

*-March, 1998*

## Response to Commentor No. 428

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*Commentor No. 428: Citizens for Medical Isotopes (Cont'd)*

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**A PATIENT SPEAKS OUT**

"I had no side effects at all with the medical isotope treatment. It was the easiest time I have ever spent in the hospital. I was just hanging out reading a book and watching the T.V. Afterward the x-rays showed my tumors had been reduced and some had completely disappeared, even though no previous treatment had done anything to reduce my tumors. Before the medical isotope treatment I had experienced tremendous pain in my back and I was on morphine quite a bit. After the treatment I had almost no back pain at all. What I love about this treatment is, it works, it takes the pain away and there's no side effects." - Laura Mosher of Mentone, Alabama

*Response to Commentor No. 428*

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*Commentor No. 428: Citizens for Medical Isotopes (Cont'd)*

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**Why FFTF is Hanford's  
"Desert Diamond"**

- ◆ The FFTF is a state-of-the-art facility – the most advanced research reactor in the United States.
- ◆ Research & Development reactor (not a defense reactor)
- ◆ The most versatile reactor in the U.S. and the world.
- ◆ The newest reactor in the U.S.
- ◆ It can "use up" old weapons materials in the process of making medical isotopes. No other reactor can do this on a large scale.
- ◆ Named one of the nation's top 10 engineering achievements by the national Society of Professional Engineers.
- ◆ Received the NEA's Federal Design Achievement Award
- ◆ Superior safety and environmental performance record carefully documented during construction and operation.

*Response to Commentor No. 428*

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## Commentor No. 428: *Citizens for Medical Isotopes (Cont'd)*

## Response to Commentor No. 428

### Organizations and Individuals Supporting FFTF

#### PATIENT ORGANIZATIONS

American Cancer Society, Benton-Franklin  
National Association of Cancer Patients  
United Way

#### THE MEDICAL COMMUNITY

Lourdes Health Network  
Dr. Albert Corrado  
Dr. James Leedy  
The Oncology Group  
Vista Family Health  
Tri-Cities Cancer Center  
Kadlec Medical Center  
Kennewick General Hospital  
United Staff Nurses Union – Spokane,  
Tacoma, Tri-Cities Chapters

#### THE MEDICAL RESEARCH COMMUNITY

Harvard Medical School  
Children's Hospital, Boston  
American Society of Nuclear Cardiology  
Louisiana State University Medical Center  
Johnson & Johnson  
Garden State Cancer Center  
Iso-Tex Diagnostics  
Radiological Society of North America  
National Institutes of Health  
NeoRx  
North American Scientific  
Battelle  
Dr. Rainer Starb, Fred Hutchinson Cancer  
Research Center

#### UNIVERSITIES

University of California, Davis  
Oregon Health Sciences University  
Oregon State University  
USC School of Pharmacy

#### ELECTED OFFICIALS & POLITICAL GROUPS

Gary Locke, Governor of Washington State  
Resolution passed by Washington State  
Senate  
Senator Slade Gorton, Washington  
Congressmen Doc Hastings and Norm Dicks,  
Washington  
Congressman Nethercutt, Washington  
Congressman Wamp, Tennessee  
Booth Gardner, former Washington governor  
Party platform of Washington State  
Republicans  
Democrats for FFTF

#### PROFESSIONAL ORGANIZATIONS

Association of Washington Businesses  
American Nuclear Society  
American Society of Mechanical Engineers  
Association of Washington Cities  
Nuclear Medicine Research Council  
Washington State Association of Counties

## Commentor No. 428: Citizens for Medical Isotopes (Cont'd)

### Company Press Release

### NeoRx Corporation Reports Cures of Lung, Breast, and Colon Cancers in Preclinical Animal Studies Using a Single Dose of Pretarget Technology

#### Results published in the Proceedings of the National Academy of Sciences

SEATTLE--(BUSINESS WIRE)--March 6, 2000-- NeoRx Corporation (Nasdaq:NERX - news) today announced publication of a peer-reviewed manuscript in the Proceedings of the National Academy of Sciences, reporting that a single dose of its proprietary Pretarget® technology cured established human lung (10/10 animals), colon (10/10 animals) and breast cancers (8/10 animals) implanted in mice. To be judged a cure, both complete disappearance of the tumor and absence of any re-growth for at least one year were required. These results were achieved with a single dose of radioactivity developed with NeoRx's proprietary Pretarget® technology. The manuscript appears in the February 15, 2000 issue of the journal.

"The key finding in these experiments was the ability to actually cure large, established tumors using the higher doses of radiation that can be safely administered with our Pretarget® technology," said Don Axworthy, NeoRx scientist and lead author on the paper. "Unlike other therapies that have been reported to be curative in animals, Pretarget® effected cures with only a single administration. We are looking forward to testing our latest Pretarget® therapy, with the incorporation of various improvements we have made since the original animal studies were done, in the clinic later this year."

In the manuscript, NeoRx scientists compared Pretarget® technology to the conventional targeting approach used by others. With Pretarget®, the targeting antibody and radiation are injected separately and at different times, and join at tumor sites where the antibody has pre-localized. Radiation that does not join the antibody is rapidly eliminated from the body. This brief exposure of normal organs permits higher doses than the conventional approach to be administered safely, as has been shown in these animal trials and in patients. By contrast, the conventional approach links the radiation (a small drug) to the large antibody molecule, irradiating normal tissues such as bone marrow as it circulates for prolonged periods in the blood. Doses using the conventional approach are limited by normal organ exposure.

"Several groups have products under development using the conventional approach to radiotherapy," said Paul G. Abrams, M.D., J.D., NeoRx's chief executive officer. "We expect to begin formal Phase I trials with at least one Pretarget® product this year. Using a prototype Pretarget® product in patients with lymphoma, we have already observed 3 complete remissions (two of which occurred in patients who had progressed after high dose therapy and stem cell transplantation) in the 7 patients treated. As in the animal studies reported in our manuscript, these responses were observed after a single dose of Pretarget®. Moreover, we began our clinical study at a dose higher than the maximum tolerated dose of conventional radiotherapy products, yet we did not see any clinically significant toxicity"

## Response to Commentor No. 428

**Commentor No. 428: Citizens for Medical Isotopes (Cont'd)****Response to Commentor No. 428****Safety and Efficacy of Colorectal Cancer Therapy Confirmed**

June 8, 2000  
MedscapeWire

Immunomedics, Inc. has announced the results of ongoing phase 2 clinical studies using CEA-Cide for the treatment of patients with metastatic colorectal cancer who failed or were intolerant to prior chemotherapy. CEA-Cide is a humanized antibody against carcinoembryonic antigen (CEA), which is produced by colorectal and many other cancer types. In this study, the antibody was radiolabeled with iodine-131, which is a therapeutic isotope.

The results reported by a clinical research team from the University of Goettingen, in Germany, led by Docent Thomas Behr, MD, involved 21 patients (group 1) studied with metastatic cancers of the colon and rectum, and 9 patients (group 2) who had their liver metastases surgically removed, and who were at high risk for recurrence. The patients received 1 dose of CEA-Cide, and were then followed for up to 18 months.

Dr. Behr reported that the patients tolerated the single injection very well, with minimal, if any, adverse effects. Of 15 evaluable patients in the first group, 2 had a partial response (more than 50% reduction in tumor) for an average of 7 months, while another 6 patients showed lower levels of tumor reduction, providing an overall response rate of 53%. In the second group, 8 (89%) of 9 patients remain free of disease for more than 15 months, whereas 47% of previously studied patients with resected liver metastases, who did not receive CEA-Cide, showed

cancer recurrence in the same time period.

"These are very encouraging results, especially since we believe that such patients can tolerate repeated courses of this therapy," stated Dr. David M. Goldenberg, chairman and chief executive officer of Immunomedics.

Colorectal cancer is the third highest cancer killer, resulting in more than 56,000 deaths each year in the United States. "Once the cancer spreads, the 5-year survival rate of patients with inoperable metastases is virtually zero, despite the development of several new chemotherapeutic agents," Dr. Behr remarked.

## Commentor No. 429: Kathryn Roberg

*I am for alternative 5 - close down FFTF.*

These are the concerns I have in regard to the restart of the FFTF Nuclear Reactor

1. Already we are experiencing a drastic global warming, as evidenced almost throughout the whole world. I am afraid that a restart of FFTF Nuclear Reactor will send more gases and waste into the Universe, whether in the air, soil or water and add to this horrendous problem of global warming.. The waste has to go somewhere. What cost are we going to have to pay because of these facilities?

2. In 1995, DOE promised in the Hanford Clean-Up Agreement to shut down the FFTF, and use the resulting savings for radioactive nuclear waste clean-up. \$100 million designated for waste-clean-up has instead been used to keep FFTF on hot standby. To restart and maintain the FFTF would cost much more. I'm concerned that the funds set aside for clean-up would be used to produce yet more highly radioactive nuclear waste. I am also very concerned about the honest use of allocated funds.

3. I understand that The USDOE's own panel of experts (Subcommittee for Isotope Research and Production planning) and the Washington State Medical Association say there is no need for FFTF as an additional source of medical isotopes. I ask the question - Is plutonium really needed for medical research radioisotopes?

4. If plutonium is produced, what are the SAFEST MEANS OF TRANSPORTING this weapons-grade plutonium to fuel the FFTF in Hanford? If transported through Puget Sound, I am concerned about the potential deadly hazards to the watersheds, to not only the entire Puget Sound but also the entire Pacific Ocean and to the millions of people who live there.

5. The deadly radioactive waste of Hanford will, if not contained properly and thoroughly, for thousands of years and countless generations, contaminate not only the Northwestern US but also beyond- (a global destruction) What are we sending on to our children and their children...a contaminated and hazardedly wasted world? Already there 177 massive, underground high-level nuclear waste tanks, some explosive, dozens leaking at Hanford. A restart of FFTF would add even more radioactive waste to these tanks. What are we doing to this world? DESTROYING IT!!!

429-1

429-2

429-3

429-4

429-5

429-3

## Response to Commentor No. 429

**429-1:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.

**429-2:** The concerns expressed in the comment with respect to potential FFTF emissions and global warming in the event of FFTF restart are noted. FFTF operations would result in small impacts to the environment and would not contribute to global warming because nuclear, rather than fossil, fuels provide the primary source of energy, resulting in negligible releases of greenhouse gases. Section 4.3 of the NI PEIS includes an evaluation of potential environmental impacts due to air emissions and wastewater discharges associated with the proposed operation of FFTF and existing Hanford support facilities. All air emissions and wastewater discharges would be in accordance with applicable permit and regulatory requirements. The release of criteria air pollutants would result in concentrations well below Federal and state air standards (Table 4-13); impacts from emissions of hazardous chemicals would have a negligible effect on human health or the environment (Tables 4-17 and 4-19); and there would be no discernible impacts to groundwater or surface water quality (Section 4.3.1.1.4). The management of the wastes that are associated with nuclear infrastructure activities at Hanford is assessed in Section 4.3.1.1.13. The ultimate disposition of these wastes is addressed in that section.

**429-3:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. A Tri-Party Agreement change was made to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on whether the facility will be used to meet mission needs. Prior public meetings were held on this formal milestone change.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1

## Commentor No. 429: Kathryn Roberg (Cont'd)

*It has been emphasized that production will cause cancer. which are some major causes of cancer in the first place?*  
 6. Almost every day I am hearing more and more cases of CANCER...My concern is that what we are putting into the whole ecosystem in this world has a tremendous impact on our health. Restarting the FFTF with its nuclear waste would add to this destruction of health and life.

429-6

I ask that these concerns be included in the official record for PU-238/FFTF

Thank you

Sr. Kathryn Roberg

*I am supporting alternative 5 - Shut down FFTF!*

429-1

*Why does EIS not address any strategies in regard to waste removal or holding? and the impact this will have on the environment?*

429-7

## Response to Commentor No. 429

would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. If the decision is made to shutdown the FFTF, then cleanup dollars will be needed to deactivate the facility, which could impact the overall Hanford cleanup schedule.

Restart and operation of FFTF would not add any waste to the Hanford underground waste storage tanks. The impacts to the environment from the NI PEIS mission were determined in Chapter 4 of Volume 1 to be negligible to the Northwest population.

**429-4:** The purpose of the NI PEIS is to evaluate the environmental impacts of reasonable alternatives to enhancing DOE's existing nuclear facility infrastructure to support production of radioisotopes for medical, research and industrial uses, production of plutonium-238 for use in future NASA space exploration missions, and U.S. nuclear research and development needs for civilian application. The plutonium that would be produced under the proposed action would not be intended for medical applications.

DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

### ***Commentor No. 429: Kathryn Roberg (Cont'd)***

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### ***Response to Commentor No. 429***

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The conclusions presented in the NERAC Subcommittee for Isotope Research and Production Planning Final Report, April 2000 regarding the suitability of FFTF to produce research isotopes in a timely and cost efficient manner were made in the context of the facility producing research isotopes as its sole mission. It would not be cost effective to restart FFTF for the singular purpose of producing small quantities of various research isotopes. However, sustained operation of FFTF for the production of larger quantities of both research and commercial isotopes would be viable if operated in concert with producing plutonium-238 and conducting nuclear energy research and development for civilian applications. As the NERAC report states: "In limited instances, the DOE possesses unique resources, e.g., the high flux of fast neutrons and large irradiation volume in FFTF, that could be utilized for the production of some radioisotopes, but is best suited for commercial interests who might consider its use for isotope production." In recognition of these constraints on its operational feasibility, the NI PEIS only evaluates the use of FFTF when coupled with the other stated missions. While some existing reactors may possess the potential capability or capacity to support research isotope production, as suggested in the NERAC report, it is unlikely that reliable, increased production of these isotopes to support projected needs could be accomplished without impacting the existing missions of these facilities.

- 429-5:** The commentor appears to express the concern that DOE would expose people in along the Pacific Coast and in the Puget Sound area to risks associated with the transport of weapons-grade plutonium. None of the proposed alternatives would involve the shipment of any weapons-grade plutonium to any port in the United States. Alternative 1 does postulate that DOE might decide at some point to import mixed oxide fuel from Europe to fuel FFTF. At this time, however, DOE has not proposed to import this fuel through any specific port. If DOE ultimately decides to import fuel from Europe, it would perform a separate NEPA analysis to select a port. This review would address all relevant potential impacts of overseas and inland water transportation, shipboard fires, package handling, land transportation, as well as safeguards and security associated with the import of SNR-300 mixed oxide fuel through a variety of specific candidate ports on the east and west coasts. It would consider all public comments, including local resolutions, concerning the desirability of bringing mixed oxide fuel into the proposed alternative ports.



***Commentor No. 429: Kathryn Roberg (Cont'd)******Response to Commentor No. 429***

In the event that DOE decides to enhance its nuclear infrastructure, it would not expose any population to high, unacceptable risks under any alternative. Any transportation activities that would be conducted by DOE would comply with U.S. Nuclear Regulatory Commission and U.S. Department of Transportation regulations. Associated transatlantic shipment would comply with International Atomic Energy Agency requirements. In Section J.6.2, DOE reviewed the potential maximum impacts from the marine transportation of mixed oxide fuel from Europe to a representative military port, Charleston, South Carolina, and overland transportation to Hanford. Also in that section, a bounding analysis demonstrates that the maximum potential radiological risks to the surrounding public from mixed oxide fuel shipments would be extremely small (e.g., less than 1 chance in a trillion for a latent cancer fatality per shipment from severe accidents at docks and in channels and less than 1 chance in 50 billion for a latent cancer fatality per shipment from overland highway accidents).

- 429-6:** Cancers are believed to be caused by a combination of hereditary and environmental factors, including exposure to ionizing radiation and chemical agents. This NI PEIS provides an estimate of the potential human health impacts associated with a range of reasonable alternatives considered for the production of radioisotopes for medical and industrial uses, research and development, and as heat sources for radioisotope power systems (see Sections 1.2 and 2.5 of Volume 1). The methodology used in the analysis of health effects, which is detailed in Appendixes H through J, is based upon our current knowledge of the health impacts that may result from exposure to low doses of ionizing radiation and chemical agents. Sections 4.3 through 4.6 of Volume 1 provides the results of the evaluation of potential health impacts that would be expected to result from implementation of any of the alternatives, including normal operations and a spectrum of accidents that included severe accidents. The environmental analysis showed that radiological and nonradiological risks associated with each of the alternatives would be small.
- 429-7:** The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be

***Commentor No. 429: Kathryn Roberg (Cont'd)***

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***Response to Commentor No. 429***

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implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

## Commentor No. 430: Charity Schweiger

August 31, 2000

My grandfather moved his family to Richland, WA, because of Hanford. And my father, the youngest of six, kept his family here because of the FFTF. Out of all the places we could have been, we ended up here. While I was growing up I was enchanted by big cities like Seattle. The big lights, the skyscrapers, the beautiful architecture, the Puget Sound. It was all so large and exciting, so purposeful. I thought the Tri-Cities was small, hot, and boring. But last year I began a study on Hanford. I studied White Bluffs, and other towns which were evicted, the trailer park it became, the operations which finally announced itself to the world in the form of "Fat Boy", the bomb dropped on Nagasaki. True, the Tri-Cities area is developing, but along side it is my view which is steadily growing also. Beneath the so-called uneventful exterior are so many important things, which have always been there but which I have never taken the time to discover. The FFTF is part of all of it. It has a history, and it has a purpose. Unlike the atomic bomb, which destroyed so many innocent lives, the FFTF has the ability to save lives in the form of medical isotopes. My grandmother died of cancer, and the kind of medical treatment FFTF can produce could have saved her beautiful and precious life. Please consider those lives, which are affected by cancer now, and those who will be affected by it later, as you make your decision about the Fast Flux Test Facility. Thank you! ~ Charity Schweiger  
Kennewick, WA

430-1

## Response to Commentor No. 430

430-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

## Commentor No. 431: Bill Dautel

8/31/00

Good evening, my name is Bill Dautel and I am speaking tonight as a citizen of the Pacific Northwest.

Recently, I read the citizen's guide distributed by Heart of America Northwest of Seattle. This guide claims that the guide "is designed to help citizens understand and comment on the draft PEIS." However, it appears that the sole purpose of this guide is to deliberately misinform citizens in an effort to force DOE's hand in the decision to restart FFTF.

This guide claims that public outcry to shutdown FFTF will "prevent more nuclear disasters at Hanford" and "save the future of Hanford cleanup."

How absurd. I have lived here for 26 years with my family. Do you think for one moment that nuclear disasters and cleanup at Hanford are not my major concerns?

I am speaking to this citizen's guide tonight because I feel the public deserves to know that most of the material in it is unsubstantiated and wrong. However, because of the time limitation, I will only be able present substantiated facts about one of its outrageous statements. I am not asking you to change your position; I merely ask that you listen with an open mind. Then I challenge you to bring your specific concerns to the table so they can be addressed. It is only by this process that you will be able to form an objective, informed position. The benefits of operating FFTF to alleviate the very real future health risks to you and your family are too important to throw them out based on heresay.

The area I would like to address tonight is the section of the Heart of America guide titled "Weapons-Grade Plutonium Could Come Through Puget Sound." The plutonium that they are referring to is unused mixed oxide fuel that has no future use in Germany but can be used to operate the FFTF reactor for 15 years. This fuel is essentially identical to FFTF fuel. As such it is not, nor could it ever be classified as, "weapons-grade" plutonium.

431-1

## Response to Commentor No. 431

431-1: DOE notes the commentor's views and observations. DOE is committed to providing the public with comprehensive environmental reviews of its proposed actions in accordance with NEPA, and to providing ample opportunity for public comment on those actions.

**Commentor No. 431: Bill Dautel (Cont'd)**

They also claim that DOE has ignored transportation risk concerns in the PEIS and that citizens <quote> "demand that USDOE acknowledge that a ship fire in Puget Sound, with plutonium on board, could kill thousands and permanently leave a large area uninhabitable. Oppose any scheme to import plutonium fuel through any port to FFTF." <unquote>

Heart of America Northwest apparently hasn't read the Appendix J of the PEIS which is entirely dedicated to the impacts of transportation.

*As Colette Brown stated earlier, the port for receiving the German fuel has not been officially selected. However,*  
If you read this section, you will discover that public and environmental safety is paramount. ~~You will also discover that~~ it is unlikely that DOE will even ship the fuel to Puget Sound, not because of any risk, but because it costs more to sail to the west coast than to sail directly to an eastern port. Charleston Naval Station has been the primary port for receiving foreign fuel for the past five years and was the port selected for detailed analysis in the PEIS.

Heart of America Northwest claims that a ship fire could kill thousands and leave a large area uninhabitable. Have they supplied you with an independently reviewed risk analysis that explains just how this event could occur? I don't think so.

Let's examine the facts. First, the FFTF fuel is designed to operate at temperatures up to 1500 degrees fahrenheit and is not susceptible to damage from the DOT severe transportation fire temperature of 1475 degrees fahrenheit. Additionally, FFTF fuel has been safety tested and shown not to leak under these conditions. Second, the fuel is transported in certified high integrity casks. These casks are subject to stringent regulatory safety testing to verify beyond doubt that they will not leak during severe transportation accident conditions, including fire. Third, certified purpose-built ships would be used to transport the fuel casks from Europe to the U.S. These ships are constructed with double hulls to assure that they can withstand a collision without

**431-1  
(Cont'd)**

**Response to Commentor No. 431**

***Commentor No. 431: Bill Dautel (Cont'd)***

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penetrating the inner hull. Every part of the ship is protected by an automatic fire system which will quickly detect, isolate, and suppress a fire should one break out in any one of the separate compartments. The individual holds can also be deliberately flooded with water, and, if all the holds were flooded the ship would still remain afloat. These levels of safety are what contribute to the low level of risk to transport the fuel. In fact, the accident risk in the PEIS was determined to be less than  $10^{-12}$  latent cancer fatalities or 1 in a trillion.

Let me put this in perspective. The risk of dying from radiation exposure received from flying round trip cross-country is approximately 1 in a million. Mighty small. The risk from fuel transportation is a million times less. So I ask you, is this the enormous risk that results in thousands of deaths as claimed by Heart of America Northwest? Hardly!! In my view this is a blatant insult to the intelligence of the public and undermines the entire NEPA process. The transportation of nuclear fuel is completely safe.

Thank you for the opportunity to speak about this PEIS issue.

William A Dautel  
2360 Mark Ave  
Richland, WA 99352

**431-1  
(Cont'd)**

***Response to Commentor No. 431***

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***Commentor No. 432: K. Contini***

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From: Contini, Katherina  
[SMTP:KCONTINI@AMPACET.COM]  
Sent: Wednesday, September 06, 2000 1:28:06 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: FFTF use for Medical Isotopes  
Auto forwarded by a Rule

I fully support the re\_start of FFTF for the production of medical isotopes!

K Contini  
Tarrytown, NY

**432-1*****Response to Commentor No. 432***

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**432-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

**Commentor No. 433: Leland Besel**

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To Whom It May Concern:

This is my testimony in support of the FFTF being used for the production of medical and industrial isotopes and the production of plutonium-238 for use in future NASA space missions. FFTF is the most modern reactor facility that the DOE currently has and has an exemplary operational history. To not use this facility for such needed isotope and U-238 missions would be inappropriate in my estimation. FFTF has been shown to be the most cost effective alternative in producing the nuclear isotopes needed for cancer treatments and cancer research. As one who has had cancer, the need to have these isotopes available within the United States for both cancer treatment and research is of paramount importance to me.

Yours truly,



Leland Besel  
2026 Howell Ave.  
Richland, WA 99352

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**433-1****Response to Commentor No. 433**

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**433-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.



## Commentor No. 434: Denny L. Condotta

August 30,2000

Colette E. Brown, NE-50  
U.S. Department of Energy  
19901 Germantown Road  
Germantown, MD 20874

Dear Ms Brown:

Subject: Comments on DOE/EIS-03100

I am pleased to offer the following comments on the Nuclear Infrastructure PEIS, DOE/EIS-03100:

1. First, I would like to compliment the preparers of this PEIS for a thorough and comprehensive report. I generally agree with the data and conclusions of the PEIS, at least in the areas where I have some knowledge.
2. I strongly recommend choice of Alternative 1, "Restart of FFTF at Hanford WA, to meet all isotope production and research requirements." My reasons for this recommendation are defined in the following comments.
3. A major reason for recommending Restart of the FFTF is **Humanitarian**. Prudent restart of the FFTF provides the greatest assurance of meeting the needs for Isotopes required for research and treatment of cancer victims, and thus will save the lives of countless people.
4. A second major reason for recommending restart of the FFTF is the fact that it is an existing facility that has started up and operated successfully for numerous years. There are in existence operating procedures, support equipment, and a trained and capable staff. It is hard to put a value on this experience base, but as an engineer that has gone through several complex plant startups, I know it represents a large amount of money and time. There will always be a large unknown risk factor associated with building a new and different facility; and with the effort to test and bring this new facility into the operating mode. For this reason alone, starting up the FFTF is the most assured and conservative way to provide the required supply of radio-isotopes. I recommend that the value of using an existing and proven facility be given much more consideration in your final draft.
5. Another factor favoring use of the FFTF is the large base of skilled and trained personnel, and laboratories and industrial resources, available in the Tri-city area, to provide technical support to the FFTF operation.
6. One concern that is raised by many of those who are opposed to a restart of the FFTF is that this action could delay the cleanup activities at Hanford, mainly by diverting funds away from the cleanup budget. However, the commitment by the DOE that the FFTF restart would not divert or reprogram budgeted funds from Hanford cleanup should resolve this issue. In fact, restart of the FFTF should make a positive contribution to funding available for cleanup, for the following reasons: (a) If the FFTF is deactivated in 5 to 10 years, funds for this activity would come out of the Hanford cleanup budget during a critical period in the Hanford Program, i.e. about when the first Waste Glassification plant is in the startup phase. Restart of

## Response to Commentor No. 434

434-1

434-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

434-2: DOE notes the commentor's support for restarting FFTF to conduct nuclear energy research and development as part of its nuclear infrastructure enhancement.

## Response to Commentor No. 434

## Commentor No. 434: Denny L. Condotta (Cont'd)

the FFTF would defer deactivation by 35 years or more, well past the peak of Hanford cleanup activities (b) If the FFTF is restarted and operated, it would utilize some general Hanford support activities, such as security, utilities, health services, etc. It would then be charged a portion of the Hanford overhead costs, resulting in lower costs being assigned to the plant cleanup activity.

7. In Section S-1 of the Summary of the PEIS it is noted that the Nuclear Energy Research Advisory Committee (NERAC) has informed the Secretary of Energy that: "There is an **urgent sense that the nation must rapidly restore an adequate investment in basic and applied research in nuclear energy if it is to sustain a viable United States capability in the 21<sup>st</sup> Century.**"

It should be recognized that restarting the FFTF will make a large contribution to the above goal; both by maintaining and enhancing skills, and also by providing a test facility for fuels and materials and possibly in areas that are not now recognized. This essentially free contribution needs further emphasis in the PEIS.

The FFTF represents a large investment of time, money and materials. It is the newest reactor in the DOE complex, and is a valuable national resource. It would be both an economic loss and also a strategic folly to permanently deactivate this facility, and then try to duplicate its capabilities elsewhere.

Respectively submitted,

*Denny L. Condotta*

Denny L. Condotta  
Chemical Engineer, Retired

2144 Harris Ave.  
Richland, WA 99352

Ph # (509) 943-4780

434-1  
(Cont'd)

434-2

434-1

## Commentor No. 435: Maurice R. Duffield

## Response to Commentor No. 435

### Draft PEIS Comment Form

*I am in favor for Start up of  
FFTF nuclear isotopes use P41238*

435-1

435-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): *Maurice R. Duffield*

Organization: *FFTF Support*

Home/Organization Address (circle one): \_\_\_\_\_

City: *Richmond* State: *VA* Zip Code: *99352*

Telephone (optional): \_\_\_\_\_

E-mail (optional): *royduffield@yahoo.com*

**COMMENTS MUST BE POSTMARKED BY September 18, 2000**

For more information contact: Colette E. Brown, NE-50  
U.S. Department of Energy • 1901 Germantown Road • Germantown, MD 20874  
Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

## Commentor No. 441: Anonymous

### Draft PEIS Comment Form

Money should be spent on eco friendly alternative energy sources such as solar & wind power. Nuclear power whether civilian or government requires digging into land for plutonium & uranium. The majority of these resources are either in areas that should be left untouched or are on reservations. Also the majority of nuclear waste is dumped in neighborhoods with poor blacks, Hispanics and Native Americans. Just look at the waste on reservations across America. Please do not expand our country's nuclear program and instead look to alternatives.

441-1

441-2

441-1

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): \_\_\_\_\_

Organization: \_\_\_\_\_

Home/Organization Address (circle one): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

## Response to Commentor No. 441

**441-1:** DOE notes the commentor's interest in alternative energy sources, although issues of research and development of alternative energy sources are beyond the scope of this Nuclear Infrastructure PEIS. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

**441-2:** Although beyond the scope of this PEIS, the commentor's concern for nationwide waste disposal practices is noted. Nuclear waste that would be generated under the alternatives and the disposition of generated waste are discussed in Chapter 4 of the NI PEIS. Potential environmental impacts on low-income and minority populations that would be expected to result from implementation of the nuclear infrastructure alternatives are evaluated in Appendix K. DOE would disposition waste generated under the nuclear infrastructure alternatives in compliance with current site practices. None of the waste would be disposed of on the Fort Hall Reservation near Idaho National Engineering and Environmental Laboratory or the Yakama Reservation near the Hanford Site.

Environmental justice is a key part of an environmental impact statement and is addressed in detail in Appendix K of the NI PEIS.

**Commentor No. 442: William J. Condotta**

10113 East 39th  
Spokane, WA  
August 26, 2000

U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE 50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

Please re-start the *Fast Flux Test Facility* for Medical Isotopes.

New treatments for cancer using medical isotopes are showing great promise in human clinical trials. A new medical isotope treatment for research (treating only a few patients) is much smaller than the quantity that will be required when the treatment becomes FDA approved. In the next several years, demand for certain medical isotopes may skyrocket as a result of their excellent performance in clinical trials.

The *Fast Flux Test Facility* (FFTF) has the capacity to produce 2-3 times more medical isotopes than all other reactors in the nation combined. We need it to be ready to supply large quantities of medical isotopes to cancer centers around the nation. The only reactor in the Western Hemisphere capable of producing large quantities of several high specific activity isotopes is the FFTF, located in the Tri-Cities in the state of Washington. The *Pacific Northwest National Laboratory* (PNNL) medical isotope program receives calls from researchers waiting for such isotopes.

Thank you very much for any help that you can give.

Sincerely,

  
William J. Condotta

**Response to Commentor No. 442**

442-1

442-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

## Commentor No. 443: Mary Ellen Condotta

10113 East 39th  
Spokane, WA  
August 26, 2000

U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE 50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

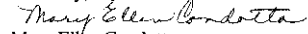
Please re-start the *Fast Flux Test Facility* for Medical Isotopes.

New treatments for cancer using medical isotopes are showing great promise in human clinical trials. A new medical isotope treatment for research (treating only a few patients) is much smaller than the quantity that will be required when the treatment becomes FDA approved. In the next several years, demand for certain medical isotopes may skyrocket as a result of their excellent performance in clinical trials.

The *Fast Flux Test Facility* (FFTF) has the capacity to produce 2-3 times more medical isotopes than all other reactors in the nation combined. We need it to be ready to supply large quantities of medical isotopes to cancer centers around the nation. The only reactor in the Western Hemisphere capable of producing large quantities of several high specific activity isotopes is the FFTF, located in the Tri-Cities in the state of Washington. The *Pacific Northwest National Laboratory* (PNNL) medical isotope program receives calls from researchers waiting for such isotopes.

Thank you very much for any help that you can give.

Sincerely,

  
Mary Ellen Condotta  
25 year Cancer Survivor

443-1

## Response to Commentor No. 443

443-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 444: Nancy Kenner

Response to Commentor No. 444

Draft PEIS Comment Form

I have cancer - leukemia  
I need FFTF - for the isotopes  
please Restart.

These isotopes are no longer  
available.

444-1

444-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Nancy Kenner

Organization: SDROPTIMIST Mid-Columbia

Home/Organization Address (circle one): 3205 W 46th

City: Kennewick State: WA Zip Code: 99337

Telephone (optional): 509 372-7201

E-mail (optional): nkenner@twiely.wsh.edu

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19001 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

## Commentor No. 445: The Ritter Family

### Draft PEIS Comment Form

What about the Hanford Cleanup  
Agreement of 89?

Clean - up Hanford!

Alternative #5 - Permanently  
deactivate FFTF !!

It is the only solution.

445-1

445-2

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): K. Ritter and Family

Organization: County Board - 800 10 / June 10

Home/Organization Address (circle one): \_\_\_\_\_

City: 2100 Ashton Way State: OR Zip Code: 97031

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

**COMMENTS MUST BE POSTMARKED BY September 18, 2000**

For more information contact: Colette E. Brown, NE-50  
U.S. Department of Energy • 1901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

## Response to Commentor No. 445

- 445-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. A Tri-Party Agreement change was made to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on whether the facility will be used to meet mission needs. Prior public meetings were held on this formal milestone change.
- 445-2:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.



Commentor No. 446: Les Gray

Response to Commentor No. 446

Draft PEIS Comment Form

we NEED FFTE Please Restart it  
it is Assure to have to buy ANYTHING  
from Russia - After All that we have BAVE them  
At NO change

446-1

446-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593

• commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Les Gray

Organization: \_\_\_\_\_

Home/Organization Address (circle one): \_\_\_\_\_

City: Robert Lee, Tx State: Tx Zip Code: 76065-9901

Telephone (optional): 915 453 2725

E-mail (optional): LSKYG@msn.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



# Commentor No. 447: Henry P. Kraemer

## Draft PEIS Comment Form

*Keep it running. It can produce needed products.*

447-1

### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): HENRY P. KRAEMER

Organization: RETIRED, SIEMENS

Home/Organization Address (circle one): \_\_\_\_\_

1109 LONG AVENUE

City: RICHMOND State: VA Zip Code: 23132

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

# Response to Commentor No. 447

447-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

# Commentor No. 448: George Ludwig

# Response to Commentor No. 448

## Draft PEIS Comment Form

27 Aug 2000  
 Dear Ms Brown,  
 WE ARE IN FAVOR OF RESTARTING  
 THE FAST FLUX TEST REACTOR FACILITY  
 AT THE HANFORD SITE IN THE STATE  
 OF WASHINGTON FOR THE PURPOSE  
 OF PRODUCING MEDICAL ISO TOPES

George Ludwig  
 Brenda Ludwig

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): \_\_\_\_\_

Organization: \_\_\_\_\_

Home/Office Address (circle one): \_\_\_\_\_  
 G. Ludwig  
 9 Cannon Row  
 Hilton Head, SC 29928-4118

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone (optional): 843 363 2926

E-mail (optional): \_\_\_\_\_

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50  
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

448-1

448-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

## Commentor No. 449: Nate and Andrea Hildebrand

### Draft PEIS Comment Form

IT SEEMS LIKE THERE ARE SAFER AND BETTER WAYS TO ACHIEVE THE MISSIONS OUTLINED IN THE PEIS. GIVEN THE INFORMATION WE'VE RECEIVED, ACCELERATORS SEEM MUCH MORE DESIRABLE THAN FFTE. WE ~~WANT~~ AS FAR AS ENERGY GOES, WE'D LIKE TO SEE THIS MONEY USED TO FURTHER RESEARCH AND DEVELOPMENT OF RENEWABLE ENERGY, SUCH AS SOLAR POWER, SPACE EXPLORATION? LET'S FOCUS ON APPRECIATING OUR OWN PLANET FIRST, AND NUCLEAR WEAPONS? PLEASE DON'T FURTHER THEIR DEVELOPMENT! COULDN'T WE USE ALL THE \$ SPENT ON MILITARY AND WEAPONS TO FIND BETTER SOLUTIONS TO THE MISSIONS GIVEN HERE? Or even to better the living conditions of ALL the world?

We vote Alternative #5 - Permanently deactivate FFTE with no new missions.

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Nate & Andrea Hildebrand

Organization: \_\_\_\_\_

☒ Home Organization Address (circle one): 1317 SE Main St

City: Portland State: OR Zip Code: 97214

Telephone (optional): \_\_\_\_\_

E-mail (optional): andrea@innategraphics.com

**COMMENTS MUST BE POSTMARKED BY September 18, 2000**

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

## Response to Commentor No. 449

449-1

449-1: DOE notes the commentor's support for Alternative 3, Construct New Accelerator(s), and support for Alternative 5, Permanently Deactive FFTE..

449-2

449-2: DOE notes the commentor's interest in alternative energy sources and concerns about space exploration and defense spending. The DOE missions to be addressed in this PEIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies. None of these DOE missions are defense- or weapons-related.

449-3

449-3: See response to comment 449-1

# Commentor No. 450: Penny and Rick Wirsing

# Response to Commentor No. 450

## Draft PEIS Comment Form

We need FFTE. Please restart it!

450-1

450-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

There are several ways to provide comments on the PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Penny & Rick Wirsing

Organization: none

(Home/Organization Address (circle one)): 9411 Van Arsdale Drive,

Vienna, VA 22181

City: State: Zip Code:

Telephone (optional): 703-846-6078

E-mail (optional): clark@cox.rr.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



## Commentor No. 451: Anonymous

### Draft PEIS Comment Form

Let's use FFTE (a national resource) for the benefit of many - the Tribes, the medical community + the consumer of medical isotopes!

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): \_\_\_\_\_

Organization: \_\_\_\_\_

Home/Organization Address (circle one): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

**COMMENTS MUST BE POSTMARKED BY September 11, 2000**

For more information contact: Colette E. Brown, NE-50  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free telephones: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

## Response to Commentor No. 451

451-1

451-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

## Commentor No. 452: Susan B. O'Donnell

316 NE 191<sup>st</sup> St.  
Shoreline, WA 98155

August 30, 2000

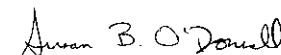
Bill Richardson  
Secretary of Energy  
United States Department of Energy  
NE – 50  
19901 Germantown Road  
Germantown, MD 20874-1290

Dear Secretary Richardson:

I am unable to attend the public hearings regarding the plans for Hanford's FFTF Nuclear Reactor, so I am writing to express my opinion on the consideration to restart Hanford's FFTF Nuclear Reactor.

I am outraged that restart of the Reactor is being considered while many of the existing nuclear waste tanks at Hanford are leaking. As a biologist and resident of Washington, I fear the disastrous effects of nuclear contamination reaching the Columbia River. Clean up of Hanford must be continued without delay and without additional waste being added to already inadequate tanks. Please honor the Hanford clean-up agreement and shut down the FFTF Nuclear Reactor.

Sincerely,

  
Susan B. O'Donnell, Ph.D.

452-1

452-2

## Response to Commentor No. 452

**452-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and concerns regarding the existing cleanup mission at Hanford and protection of the Columbia River. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. If the decision is made to shutdown the FFTF, then cleanup dollars will be needed to deactivate the facility, which could impact the overall Hanford cleanup schedule.

In regard to the concerns about the migration of contaminants to the Columbia River, the Hanford Site has a comprehensive waste minimization and pollution prevention program in place as summarized in Section 3.4.11.8 that would govern any proposed site activities. The alternatives delineated in the NI PEIS would not have an impact on Hanford cleanup activities and none of the alternatives considered would add to existing tank waste volumes.

More specific to the alternatives presented in the NI PEIS, FFTF is located approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to the groundwater. Analyses presented in Chapter 4 of the NI PEIS (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4) indicate that there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of the existing Hanford facilities in support of the proposed activities. Also, no

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***Response to Commentor No. 452***

water quality impacts would be expected as a result of permanent deactivation of FFTF (Section 4.4.1.2.4).

**452-2:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.

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***Commentor No. 452: Susan B. O'Donnell (Cont'd)***



## Commentor No. 453: Patricia Hale, Washington State Senator 8th Legislative District



### Washington State Senate

**Olympia Office:**  
305 Legislative Building  
PO Box 40108  
Olympia, WA 98501-0108

**Senator Patricia S. Hale**  
Republican Caucus Chair  
8th Legislative District

Phone: (360) 786-7614  
FAX: (360) 786-7520  
Toll Free: 1-800-562-6000  
e-mail: hale\_pat@leg.wa.gov

August 28, 2000

Ms. Colette E. Brown, NE-50  
U.S. Department of Energy  
19901 Germantown Road  
Germantown, Maryland 20874

Dear Ms. Brown:

As State Senator for Washington's 8<sup>th</sup> legislative district, I represent the area in which the Hanford Site is located. Hanford's neighbors are my constituents, and I welcome this opportunity to speak out on their behalf.

The Fast Flux Test Facility (FFTF) has long been the crown jewel of the nuclear industry. It remains the nation's newest and safest reactor, which has been borne out by ten years of operating excellence. But the government has never tapped into the enormous potential of this remarkable facility, and the time has come to do so.

With the FFTF, we have a reactor with the unique capability to produce life-saving medical isotopes while leading the way to breakthroughs in medical research. The FFTF is the only existing facility that can provide our country with the projected quantity, variety and quality of isotopes that will be needed in the coming decades. Why then is the United States supporting some 100 research reactors in 40 foreign countries? It seems incomprehensible that our government would choose to invest in foreign facilities rather than the far superior test reactor we have right here at home.

Obviously, there is a clear and compelling need for medical isotopes. This year, in the United States alone, more than 550,000 people will die of cancer and more than 950,000 will die of heart disease. The annual cost of healthcare has already surpassed the \$1 trillion mark and is expected to reach a staggering \$2.3 trillion by 2015.

Our country can no longer afford to turn its back on an existing, state-of-the-art facility – already paid for by taxpayer dollars – that could and should lead the world in medical isotope production

453-1

## Response to Commentor No. 453

**453-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF. DOE also notes the commentor's statement about the Foreign Research Reactor Program; however, this program, managed by the DOE Office of Environmental Management, is separate from the proposed action in this PEIS.

**Commentor No. 453: Patricia Hale, Washington State Senator  
8th Legislative District (Cont'd)**

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Ms. Colette E. Brown, NE-50  
Page 2

and research. Nor should we risk heavy reliance on foreign sources – no matter how friendly – for our isotope supply. History is filled with grim reminders of national vulnerabilities that were created and consequences wrought by changing political winds.

And finally, at a time when the world is struggling with scientific challenges -- in medical treatments, energy production, waste management and space exploration -- it would be both wasteful and foolhardy for the government to dismantle this versatile facility that could bolster our national capabilities and lead the way to important new discoveries.

I wholeheartedly support the restart of the FFTF and urge the Department of Energy to move ahead without further delay.

Thank you for allowing me to voice these views.

Sincerely,



Senator Patricia S. Hale  
8<sup>th</sup> District

**453-1  
(Cont'd)**

**Response to Commentor No. 453**

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# Commentor No. 454: Daniel and Kitty Gandee

# Response to Commentor No. 454

## Draft PEIS Comment Form

We support restart of FFTF Now. We don't have time to build new facilities (10~15 years) & don't have the money to build new accelerators (which might need a reactor to power the operation). People who are dying from Cancer cannot wait. We need to have empathy for those who are suffering. ~~Investment in space technology~~  
Buying from Russia or other countries is NOT a long term solution and it jeopardizes National Security.

Daniel & Kitty GANDEE

## There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Daniel & Kitty Gandee

Organization: \_\_\_\_\_

Home/Organization Address (circle one): 1404 Black Ct

City: Richland State: GA Zip Code: 99352

Telephone (optional): \_\_\_\_\_

E-mail (optional): Kitty-gandee@juno.com

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-SO  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

454-1

454-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

## Commentor No. 455: Marion McGaughey

### Draft PEIS Comment Form

WE NEED FFTF - PLEASE RESTART IT  
USE THE MONEY IT WILL SAVE TO  
MAKE OUR ASYLED FORCES READY

THANKS

455-1

## Response to Commentor No. 455

455-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

#### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): \_\_\_\_\_

Organization: \_\_\_\_\_

Home/Organization Address (circle one): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

**COMMENTS MUST BE POSTMARKED BY September 11, 2000**

For more information contact: Colette E. Brown, NE-SO  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

# Commentor No. 456: Mary E. and Melvin Ward

# Response to Commentor No. 456

## Draft PEIS Comment Form

*We need to keep FFTF*  
*Keep*

456-1

456-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): *Mary E. Ward Melvin Ward*

Organization: \_\_\_\_\_

Home/Organization Address (circle one): *1217 Withers Ln.*City: *Farmington,* State: *NM* Zip Code: *87401*

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50  
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
 E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

# Commentor No. 457: Paul Moyer

## Draft PEIS Comment Form

Ms. Brown,

8/29/00

Having already sent "comments" to you on the Draft PEIS, strongly supporting Alternative Five, I will take no more of your time on this matter.

Sincerely, Paul Moyer

SEP-27-00

457-1

457-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.

## There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Paul Moyer

Organization: \_\_\_\_\_

Home/Organization Address (circle one): P.O. Box 930  
White Salmon, WA.

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: 98672

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19001 Germantown Road • Germantown, MD 20874  
toll-free telephone: 1-877-562-4593 • toll-free fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

# Response to Commentor No. 457

Commentor No. 458: Nita Vanmy

Response to Commentor No. 458

Draft PEIS Comment Form

I feel we need FFTF. You need  
to restart it.  
The reasoning behind restarting  
it seems to be logical and necessary.

458-1

458-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure  
PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Nita Vanmy

Organization: /

Home Organization Address (circle one): HCR 84 Box 65

City: Marietta State: TX Zip Code: 76859

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50  
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

# Commentor No. 459: Emily D. Munn

## Draft PEIS Comment Form

*I think we need FFTE. Please restart it.  
 Wanda Wynne's reasoning seems very  
 rational.*

459-1

### There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Emily D. Munn

Organization: \_\_\_\_\_

Home/Organization Address (circle one): 2801 Chattanooga Drive

City: San Angelo State: Tx Zip Code: 76904

Telephone (optional): \_\_\_\_\_

E-mail (optional): \_\_\_\_\_

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Cokelle E. Brown, NE-30  
 U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874  
 Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592  
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

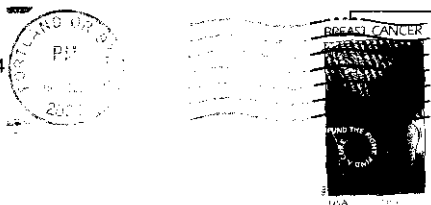
# Response to Commentor No. 459

459-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.



**Commentor No. 460: Andrew Butterfield**

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

**Public comment on Nuclear Infrastructure Draft Programmatic  
Environmental Impact Statement (NI PEIS)**

I am opposed to restart of the Fast Flux Test Facility reactor because:

*There is no safe way to dispose of  
the waste produced by this reactor,  
and the facility is up stream from  
many populated areas which use  
the Columbia for food and recreation*

Name Andrew Butterfield  
Address 2830 NE 35<sup>TH</sup> AVE  
City, state Portland, OR. Zip 97212

**Response to Commentor No. 460**

**460-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**460-2:** The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE Orders. The potential impacts to human health and environmental media including air, water, and land are shown in Section 4.3 of Volume 1 to be small.

FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

### *Response to Commentor No. 461*

08764-1207 [Barcode]

I am opposed to restart of the Fast Flux Test Facility reactor because:

Name Melissa Williams  
Address 4820 NE Hazel Ave #K-101  
City, state Vancouver, WA Zip 98663

**461-2:** DOE notes the commentor's concern regarding waste management. The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

461-2

None of the alternatives or alternative options propose the transportation of wastes to Hanford. Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

## 2-661

1999



000462 rec'd 9/5/66

[illegible]

I am opposed to restart of the Fast Flux Test Facility reactor because:

I do not believe the DOE is being honest with

the American people about the need to restore FIFT.  
Hanford  
~~It~~ is the largest threat to the Pacific Northwest.

! due to our government, legislature (state and national) and local

(Portland) commissioners. The mission at Hayward is cleanup,  
Not restarting FTF.

Name Pat Hazlett

Address 7215 SW 8<sup>th</sup> Ave

City, state Portland OR Zip 97219

## Chapter 2—Written Comments and DOE Responses

- 462-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.
- 462-2:** DOE notes the commentor's concern. Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure for the purposes of addressing three primary needs: 1) to support the need for increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee; 2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238, a fuel source that is required for deep space missions and which the U.S. has no long-term, assured supply; and 3) to support civilian nuclear research and development needs in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio. Section 1.2 of Volume 1 was revised to clarify the purpose and need of the proposed action. The NI PEIS evaluates the environmental impacts of a range of reasonable alternatives for accomplishing the three missions. In addition to restarting the FFTF, the NI PEIS also evaluates alternatives that would either employ the use of existing facilities or rely on the construction of new facilities.

- 462-3:** DOE notes the commenter's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. If the decision is made to shutdown the FFTF,

***Commentor No. 462: Pat Hazlett (Cont'd)***

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***Response to Commentor No. 462***

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then cleanup dollars will be needed to deactivate the facility, which could impact the overall Hanford cleanup schedule.

- 462-4:** In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.

**Commentor No. 463: Lynn Hanrahan**

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

0A7541207

**Public comment on Nuclear Infrastructure Draft Programmatic  
Environmental Impact Statement (NI PEIS)**

I am opposed to restart of the Fast Flux Test Facility reactor because:

*all efforts of funding should be  
directed to clean-up. This site is  
already a hazard to the environment,  
the people & the animals in the northwest!  
Do not restart!*

Name Lynn Hanrahan  
Address 2718 SE Brooklyn St  
City, state Portland OR Zip 97202

**Response to Commentor No. 463**

**463-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**463-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

**463-1**

**463-2**

**463-1**

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. If the decision is made to shutdown the FFTF, then cleanup dollars will be needed to deactivate the facility, which could impact the overall Hanford cleanup schedule.

Current waste management activities are conducted in accordance with applicable Federal and state laws and regulations and appropriate DOE orders.

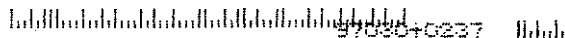
**Commentor No. 464: Scott D. Swanson**

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

76



**Public comment on Nuclear Infrastructure Draft Programmatic  
Environmental Impact Statement (NI PEIS)**

I am opposed to restart of the Fast Flux Test Facility reactor because:

We were promised  
CLEAN UP first we do  
not need to make ANY  
more waste. Oregon and  
Washington have sacrificed enough for  
the Cold War effort CLEAN UP the mess!  
Name SCOTT D. SWANSON  
Address 4773 N.E. 75<sup>TH</sup> AVE.  
City, state Portland, Oregon Zip 97218

**Response to Commentor No. 464**

464-1

464-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

464-2

464-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. A Tri-Party Agreement change was made to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on whether the facility will be used to meet mission needs. Prior public meetings were held on this formal milestone change.

**Commentor No. 465: Sara Lillegard**

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

76



**Public comment on Nuclear Infrastructure Draft Programmatic  
Environmental Impact Statement (NI PEIS).**

I am opposed to restart of the Fast Flux Test Facility reactor because:

the disadvantages are detrimental to  
the world specifically that ecosystem we  
need to begin to think beyond greed and  
selfishness and have concern for  
those that will live here after us.

Name Sara Lillegard  
Address 159 E 24th Pl  
City, state Eugene OR Zip 97405

**Response to Commentor No. 465**

465-1

465-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

465-2

465-2: The impacts of the various alternatives, including No Action, on ecological resources at ORR, INEEL, and Hanford are assessed in Chapter 4 of the NI PEIS. It was determined that there would be negligible short- or long-term ecological impacts at these sites.

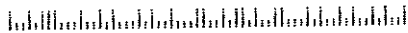
**Commentor No. 466: Yvonne McDonald**

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

76



**Public comment on Nuclear Infrastructure Draft Programmatic  
Environmental Impact Statement (NI PEIS)**

I am opposed to restart of the Fast Flux Test Facility reactor because:

*THIS FACILITY THREATENS THE  
INTEGRITY OF THE COLUMBIA  
RIVER.*

Name *YVONNE McDONALD*  
Address *2733 SW TROY ST.*  
City, state *PORTLAND, OR* Zip *97219*

**Response to Commentor No. 466****466-1**

**466-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**466-2**

**466-2:** FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.



76

Address 159 E 24th Pl.  
City, state Eugene OR. Zip 97405

**467-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

<b>467-1</b>	<b>467-2:</b> DOE notes the commentor's concerns related to potential environmental impacts.
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<p><b>467-2</b></p>	<p>The environmental impacts associated with operation of the FFTF during normal operations and from postulated accidents are presented and discussed in Section 4.3 of the draft NI PEIS. All impacts to human health and insults to environmental media including air, water, and land are shown to be small. No fatalities would be expected from the 35-year operating period of the FFTF. Any discharges would be in accordance with applicable permit and regulatory requirements and the impacts on air and water quality would be small. The potential impacts to the Hanford area and transportation corridors to and from Hanford associated with FFTF operations are also shown to be small. Because of the small impacts associated with FFTF restart, the danger to our planet or to the survival of the human species would be virtually nonexistent.</p>
<p><b>467-3</b></p>	

**467-3:** DOE notes the commentor's views on nuclear power.

## Commentor No. 468: Liz Copeland/Susan Giese

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

1474+1207

### Public comment on Nuclear Infrastructure Draft Programmatic Environmental Impact Statement (NI PEIS)

Both of us

are opposed to restart of the Fast Flux Test Facility reactor because:

We feel that, since Hanford is  
presently radioactively polluted and  
years behind cleanup schedule, the  
FFTF should not, under any foreseeable  
circumstances, be restarted.

Name Liz Copeland / Susan Giese

Address 1917 NE Fourth Ave.

City, state Portland, OR Zip 97212

## Response to Commentor No. 468

**468-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**468-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. If the decision is made to shutdown the FFTF, then cleanup dollars will be needed to deactivate the facility, which could impact the overall Hanford cleanup schedule.

**469-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

### *Response to Commentor No. 470*

Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

[illegible]

**470-1**

**470-2**

**470-3**

Name S. DALY  
Address P.O. Box 1307  
City, state Kalamazoo, MI Zip 49001

**470-2:** DOE notes the commenter's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

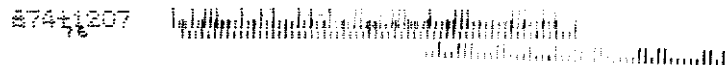
**470-3:** FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

**Commentor No. 471: Richard Bailey**

Hanford Watch  
2285 SE Cypress  
Portland, Oregon 97214



Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290



**Public comment on Nuclear Infrastructure Draft Programmatic  
Environmental Impact Statement (NI PEIS)**

I am opposed to restart of the Fast Flux Test Facility reactor because:

Is not the world  
contaminated enough!!!

Name Richard Bailey  
Address 2837 NE 14th Ave  
City, state Portland OR Zip 97212

**Response to Commentor No. 471**

**471-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**471-2:** The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

**Hanford Watch:**  
2285 SE Cypress  
Portland, Oregon 97214

Ms. Colette Brown  
U.S. Department of Energy  
Office of Space and Defense Power Systems  
NE-50  
19901 Germantown Road  
Germantown, Maryland 20874-1290

10174/1293

**Public comment on Nuclear Infrastructure Draft Programmatic Environmental Impact Statement (NIP EIS)**

**I am opposed to restart of the Fast Flux Test Facility reactor because:**

The legacy of nuclear waste contamination of groundwater and its seepage into the Columbia River ~~has not~~ persists in spite of intense efforts to get the government to fix it. Fix the <sup>existing</sup> problems before anything new ones

Name Paul Gleason

Address 763f SW 36<sup>th</sup>

City, state Portland OR Zip 97219-1631

472-1

472-2

### *Response to Commentor No. 472*

- 472-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.
- 472-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford and the risk of contamination to the Columbia River. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The proposed activities delineated in the NI PEIS would not have an impact on the Columbia River. FFTF is located approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to the groundwater. Analyses presented in Chapter 4 of the NI PEIS (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4) indicate that there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of the existing Hanford facilities in support of the alternatives. Also, no water quality impacts would be expected as a result of permanent deactivation of FFTF (Section 4.4.1.2.4).

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

***Commentor No. 473: Pat Rogers***

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NI PEIS Toll\_Free Telephone

9/2/00

Pat Rogers  
Pasco, WA  
509\_547\_9378

I would like to leave a comment on the FFTF at Richland, Washington. I believe this plant should be put into use for the production of radioisotopes and possibly power. It is a multi-million dollar plant that is just sitting out there, and because the people in Seattle and Portland don't seem to want to utilize this utility is totally ridiculous. I think we need it, and I think it needs to be started.

473-1

***Response to Commentor No. 473***

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**473-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF. The commentor should note that the heat generated by FFTF operation will not be used for generation of electricity.

## Commentor No. 474: Edwin Schlupford

NI PEIS Toll\_Free Telephone  
9/2/00

Edwin Schlupford  
206\_767\_4710

This comment is in regards to restarting of Fast Flux Reactor. I am very strongly opposed to it. I would like to make the following comments. First of all, we have never figured out what to do with nuclear waste. The Germans have finally pulled themselves up to their knees with their bootstraps and decided to shut down their nuclear infrastructure. Thank goodness they worked out with industry a good compromise, and it is happening very shortly in a matter of years from now. We need to go that same direction, and I don't know or understand why us Americans can't be leaders for a change instead of late Charlie followers. We don't know what to do with nuclear waste. We've got a big, big mess on our hands. We've tried to find places like Yucca Mountain, which ironically we later find out that has a faster leak rate than we anticipated because of a man-made product that has only been in the world since the development of the nuclear age, and we were able to trace it down to Yucca Mountain. The whole idea of transferring nuclear waste from the private sector into the public is a complete transfer of liability. We need to as citizens stand up and say what is right and wrong.

This type of restarting and continuing on with this thing, which has even been written into it the possibility of potential other uses, which could be many different things, including weapons, is totally ridiculous. And sitting under the ruse of nuclear medicine is exactly that.

Thank you very much for your time. We need to, you know, nuclear energy would be fine if it was a total start to finish solution, but we only [have] half [of] that thing figured out. Until we figure out the whole end of it, in other words, the disposal end, we should not be and it is irresponsible to be involved with this and burdening our future generations. We should spend the money on shutting this stuff down; getting people into other jobs that can do something useful in cleaning up our messes that we have inherited from our fathers.

474-1

474-2

474-3

474-2

474-4

## Response to Commentor No. 474

**474-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**474-2:** The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

The NI PEIS assumes, for the purposes of analysis, that Yucca Mountain Nevada, would be the final disposal site for DOE's high-level radioactive waste and spent nuclear fuel. As directed by the U.S. Congress through the Nuclear Waste Policy Act, as amended, Yucca Mountain is the only candidate site currently being characterized as a potential geologic repository for high-level radioactive waste and spent nuclear fuel. DOE has prepared a separate EIS, "Draft Environmental Impact Statement for a Geologic Repository for the Disposal of Spent Nuclear Fuel and High Level Radioactive Waste at Yucca Mountain, Nye County, Nevada" DOE/EIS-0250D, July 1999), which analyzes the environmental impacts from construction, operation and monitoring, related transportation, and eventual closure of a potential geological repository.

**474-3:** DOE notes the commentor's views. Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure for the purposes of addressing three primary needs: 1) to support the need for increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee; 2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238, a fuel source that is required for deep space missions and which the U.S. has no long-term, assured supply; and 3) to support civilian nuclear research and development needs in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio.



***Commentor No. 474: Edwin Schlupford (Cont'd)***

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***Response to Commentor No. 474***

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However, no component of the proposed action is for the purpose of supporting any defense or weapons-related mission. Section 1.2 of Volume 1 was revised to clarify the purpose and need of the proposed action.

- 474-4:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF. The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

### ***Commentor No. 475: The Ritter Family***

NI PEIS Toll\_Free Telephone

9/4/00

Jeanna Ritter  
Sean Ritter  
Katherine Ritter  
John Ritter  
Hood River, OR

I would like to voice my concern about the start of the Hanford nuclear plant. Hanford's highlevel nuclear waste tanks are already presently leaking radioactive waste into the groundwater. This is moving much closer to the Columbia River, and it is threatening the life of the river and also the people downstream. With this real and intermittent danger, how can anyone reasonablypropose restarting a reactor that will add more waste to this ecosystem. My family and I arestrongly against restart of this nuclear plant.

475-1

475-2

### ***Response to Commentor No. 475***

**475-1:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

As identified in Section 4.3.1.1.13 of the NI PEIS, the restart of FFTF would generate about 63 cubic meters of additional radioactive waste (e.g., solid low-level radioactive waste) annually, in addition to nonhazardous wastes. This would account for about 2,205 cubic meters of additional radioactive waste to be generated over the 35-year period of nuclear infrastructure operations and is small in comparison to the waste generated by current Hanford activities. This waste would not be sent to the high-level radioactive waste tank farms. High-level radioactive waste would not be generated from merely operating FFTF. It is DOE's policy that all wastes be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

The NI PEIS addressed the environmental impacts due to the treatment storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision.

**475-2:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**Commentor No. 566: Kevin Kraal**

From: Kevin Kraal[SMTP:KEVINK@MICRON.NET]  
 Sent: Friday, September 01, 2000 2:51:48 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: Plutonium production  
 Auto forwarded by a Rule

Sirs:

I am opposed to any plan involving the production of more PI238, especially at INEEL in abuilding already considered unsafe. I certainly understand the need for this element in variousscintific endeavors, however there is, as I understand it, no need for more of this at the presenter the foreseeeable future. NASA has reportedly enough for its missions. There is alreadydocumented groundwater contamination under the site. Our town (Twin Falls) obtains its drinking water from the very same aquifer under INEEL. The reprocessing method will produceeven more potential contamination. The current technology does not allow for truly safe disposal, and until it does, to produce yet more toxic (deadly, in fact) waste would be folly.

Most sincerely,

Kevin Kraal, MD  
 4155 Meadowridge Circle  
 Twin Falls, Id

566-1

566-2

566-3

**Response to Commentor No. 566**

**566-1:** DOE notes the commentor's opposition to enhancing its existing nuclear facility infrastructure to support production of plutonium-238 for use in future NASA space exploration missions, and in particular the use of INEEL for support of this action. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA space missions; no viable alternative to using plutonium-238 to support these missions currently exists. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted by approximately 2005. Without an assured domestic supply of plutonium-238, DOE's ability to support future NASA space exploration missions may be lost.

A May 22, 2000, correspondence from NASA to DOE identified that NASA no longer has a planned requirement for small radioisotope thermoelectric generator (SRTG) power systems. This does not mean that NASA no longer requires DOE to provide the necessary plutonium-238 to support deep space missions. Rather, the suspension of SRTG development efforts was conducted in order to permit reprogramming of funds to support development of a new radioisotope power system based on a Stirling technology generator. This new radioisotope power system, referred to in the subject correspondence, requires 1/3 less plutonium as its fuel source. However, the Stirling technology is developmental and NASA has requested in a September 22, 2000 letter to DOE that the plutonium-238 needed for large RTG may be maintained as a backup. Section 1.2.2 of Volume 1 was revised to further clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

**566-2:** DOE notes the commentor's concerns regarding existing groundwater contamination at INEEL and for additional groundwater impacts. DOE would not reprocess spent nuclear fuel under any of the alternatives

### ***Commentor No. 566: Kevin Kraal (Cont'd)***

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### ***Response to Commentor No. 566***

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considered in this NI PEIS. Options under the nuclear infrastructure alternatives include fabricating and processing neptunium-237 targets at the Fluorinel Dissolution Process Facility (FDPF) at INEEL to produce plutonium-238 for NASA space missions.

Although beyond the scope of this NI PEIS, activities to remediate existing contamination of the Snake River Plain aquifer attributable to INEEL sources are ongoing and of high priority to DOE. Section 3.3.4.2 describes the current condition of groundwater potentially affected by INEEL operations, with a specific discussion of groundwater quality of the proposed facility location provided in Section 3.3.4.2.2. Analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.2.1.4, 4.4.2.1.4, 4.5.2.2.4, and 4.6.2.2.4) addressing use of the FDPF indicate that there would be no discernible impacts to groundwater or surface water quality at INEEL from normal operation of FDPF in support of the proposed activities. Use of Advanced Test Reactor to irradiate neptunium-237 targets would have no additional impact on water resources in the Test Reactor Area of INEEL as discussed in Section 4.4.1.1.4.

Waste that would be generated as a result of target processing are discussed in Section 4.3.2.1.13. Waste generated from the candidate facilities at INEEL under the nuclear infrastructure alternatives would be managed in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and DOE orders. INEEL also has a comprehensive waste minimization and pollution prevention program in place as summarized in Volume 1, Section 3.3.11.8 that would govern any proposed site activities.

- 566-3:** The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

***Commentor No. 567: Joanna Panter***

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From: Joanna Panter  
[SMTP:JPANTER@EARTHLINK.NET]  
Sent: Friday, September 01, 2000 3:29:37 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: Please restart the FFTF  
Auto forwarded by a Rule

To whom it may concern,

I am writing this brief e-mail to encourage restarting the Fast Flux Test Facility. I understand the importance of the FFTF and wish for its being brought back from stand-by mode.

Thank you.

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**567-1*****Response to Commentor No. 567***

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**567-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

***Commentor No. 568: Holly Conley***


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From: Holly Conley[SMTP:HCONLEY@KMPS.COM]  
 Sent: Friday, September 01, 2000 6:57:08 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: shut down!  
 Auto forwarded by a Rule

Please hear my request to NOT restart FFTF in Hanford. This reactor needs to be shut down completely, and the existing waste cleaned up as promised. Please; no more waste, no more danger, no more plutonium production at Hanford.

Thank you for your serious consideration in this matter.

Regards,

Holly Conley

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**568-1**

**568-2**

***Response to Commentor No. 568***


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**568-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF.

**568-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. A Tri-Party Agreement change was made to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on whether the facility will be used to meet mission needs. Public meetings were held on this formal milestone change.

With respect to plutonium processing, no weapons material will be produced within the stated mission. All proposed activities are for civilian purposes.

**Commentor No. 569: Roberta Wilson**

From: Roberta Wilson[SMTP:BERTAW@MICROSOFT.COM]  
 Sent: Friday, September 01, 2000 7:03:46 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: Comments on start up of FFTF  
 Auto forwarded by a Rule

Please write these comments into the record:

Dear Ms. Brown,

In 1986 I walked across the country with the Great Peace March for GlobalNuclear Disarmament. I was 31, and I had left my job in the computerindustry to do this nine\_month walk during which we spoke with thousands ofcitizens about the danger of nuclear weapons.

When we arrived in your neighborhood\_\_the DC office of the Department ofEnergy\_\_we shut the place down for awhile. I bought cookies and coffee foryour locked out workers. I figured I might be able to talk to them that way.

They were mad, of course, but we finally did talk. I think I showed themthat I was the same as they were\_\_I had an education, a job, and I vote.Still, my voice was not being heard by my government regarding nuclearenergy and weapons.

We "anti\_nuke activists" are portrayed as troublesome and dangerous at worstand silly and misinformed at best. We are neither. We are citizens who aretelling you that WE DO NOT WANT NUCLEAR TECHNOLOGY\_\_primarily because wasteissues and accident issues are unresolved and it seems at presentunresolvable. Hanford is the most polluted site in our country, and clean\_upshould be the first priority. We've waited years for it. I suspect that thereason Hanford is not cleaned up is that there is no way to clean up nuclearwaste that is seeping into the groundwater near the Columbia River.

569-1

569-2

**Response to Commentor No. 569**

**569-1:** The Commentor's opposition to nuclear technology because of waste and accident issues is noted. The PEIS evaluates the impact on waste generation and the consequences of accidents for all alternatives in detail in Volume 1 Chapter 4. The results of this evaluation are presented in PEIS Volume 1, Section 2.7.1.

**569-2:** Restoration of the Hanford Site and waste management activities are the primary missions at Hanford. DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to the groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

***Commentor No. 569: Roberta Wilson (Cont'd)***

I find the medical excuse for starting the Fast Flux Test Facility to be an untenable and extremely cynical attempt to get the public back on board for nuclear power. As the doctor at the Seattle DOE hearings said, other technology is a better choice for addressing cancer than the production of medical isotopes. Even a better choice is to eliminate the causes of cancer\_\_environmental pollutants, including nuclear.

**569-3**

I urge you and Secretary Bill Richards to do the right thing\_\_Clean up Hanford (if possible) and do not start the Fast Flux Test Facility.

**569-2**

**569-4**

Roberta Wilson  
353 Wallace Way NE #14  
Bainbridge Island, WA 98110

***Response to Commentor No. 569***

**569-3:** DOE notes the commentor's views regarding the potential use of FFTF for enhancing DOE's existing nuclear facility infrastructure and the use of isotopes in treating cancer. Cancers are believed to be caused by a combination of hereditary and environmental factors, including radiological and chemical agents. In ongoing clinical testing, therapeutic radioisotopes have proven effective in treating cancers and other illnesses while minimizing adverse side effects, making their use an attractive alternative to traditional chemotherapy and radiation treatments.

**569-4:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.



**Commentor No. 570: Michael Tobin**

From: MTobin1907@cs.com%internet  
[SMTP:MTOBIN1907@CS.COM]  
Sent: Saturday, September 02, 2000 11:22:24 AM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: plutonium production  
Auto forwarded by a Rule

Ms. Colette Brown  
DOE, Office of Space and Defense Power Systems

Dear Ms. Brown,

As an Idaho resident I have these comments regarding DOE plans to produce plutonium\_238 at the INEEL.

- a.. Reprocessing is not acceptable and should not be considered at INEEL or any other facility
- b.. Building 666 is a decrepit and highly contaminated building and should be decommissioned in a manner that is protective of human health and the environment
- c.. Plutonium\_238 production is unnecessary and its use too risky
- d.. Using ATR at INEEL would interfere with its current mission of producing medical and industrial isotopes
- e.. Extend the comment deadline 30 days

While there is no preferred alternative in this study, which is entitled Draft Programmatic Environmental Impact Statement for Accomplishing Expanded Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility (FFTF) at Hanford, WA., DOE would prefer to accomplish the aforementioned activities at the Fast Flux Test Facility at Hanford. However, there is significant popular and political opposition within Washington state to the FFTF proposal, political opposition that does not exist in Idaho. Thus, without strong opposition in Idaho, we could well end up with this program by default.

Sincerely,

Michael Tobin  
Boise

**Response to Commentor No. 570**

**570-1:** DOE would not conduct any reprocessing to produce weapons grade plutonium under any of the alternatives considered in this PEIS. The alternatives do include processing of target materials used to produce isotopes for medical and industrial uses, plutonium-238 for space missions, and nuclear materials research and development. Sections 4.3.1.1.13; 4.3.2.1.13; 4.3.3.1.13; and 4.4.3.1.13 were revised to clarify the waste management approach for waste resulting from processing of target materials for plutonium-238 production.

Building CPP-666 is divided into two parts, the Fuel Storage Facility and the Fluorinel Dissolution Process Facility (FDPF). The FDPF is under consideration in this PEIS for storage of neptunium-237 oxide, preparation of neptunium-237 targets, and separation of plutonium-238 from irradiated targets. DOE believes that this facility will meet, with further analysis and/or minor modifications, the criteria to safely conduct these operations.

**570-2:** DOE notes the commentor's opposition to enhancing its existing nuclear facility infrastructure to support production of plutonium-238 for use in future NASA space exploration missions. Section 1.2.2 of Volume 1 was revised to clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

Potential health and safety impacts associated with normal operations, facility accidents, and transportation as a result of the proposed production of plutonium-238 are relatively low and are discussed in detail in Chapter 4 of Volume 1 and Appendixes H, I, and J of Volume 2 in the Final NI PEIS. For over 30 years, radioisotope power systems have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. However, potential health and safety impacts associated with future launches of spacecraft utilizing plutonium-238 are not within the scope of the NI PEIS analysis, but would be addressed in the specific NEPA documentation prepared by NASA in support of such missions.

**570-3:** As stated in EIS Volume 1, Section 2.3.1.2, ATR would continue to meet its medical and industrial radioisotope production mission for the no action and most other alternatives considered where ATR is not used for the production of plutonium-238. If ATR were to be used as a production facility for plutonium-238 (options 1, 2, 3, 7, 8, and 9 under

### ***Commentor No. 570: Michael Tobin (Cont'd)***

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### ***Response to Commentor No. 570***

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Alternative 2), it would support medical and industrial radioisotope production to the extent possible. DOE would try to minimize the impact of the new mission on current medical and industrial radioisotope production.

- 570-4:** DOE notes the commentor's request for extension of the public comment period. The Council on Environmental Quality's (CEQ) "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act" (40 CFR 1506.10(c)) require that a minimum of 45 days be allowed for public comment on the Draft NI PEIS. As stated in the Notice of Availability (65 FR 46443 et seq.), the public comment period began on July 28, 2000 and continued to September 18, 2000. In preparing the Final PEIS, DOE has assessed and considered both oral and written comments received on the Draft PEIS during the public comment period and has responded to these comments in the Final PEIS. Volume 3 of the NI PEIS contains public comments received on the NI PEIS and DOE responses to those comments. Moreover, late comments were considered to the extent practicable.
- 570-5:** As outlined in 40 CFR Part 1502.14 (e), an agency is not required to specify a preferred alternative or alternatives in the Draft EIS if one does not exist, but must do so in the Final EIS. Accordingly, DOE has identified its preferred alternative in Section 2.8 of Volume 1 and included a discussion of DOE's reasons for selecting it. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.
- 570-6:** During the comment period for the NI PEIS, DOE received comments both for and against implementation of Alternative 1, Restart FFTF. Public comment is one of the factors that will influence the Record of Decision. The Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives. DOE's decision will not default to any of the candidate sites because of popular support or opposition.

**Commentor No. 571: Louis E. McMurray**


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From: Louis E McMurray  
 [SMTP:LOUMCMURRAY@JUNO.COM]  
 Sent: Saturday, September 02, 2000 1:27:42 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: Restart of the Fast Flux Test Facility at Hanford,  
 WA  
 Auto forwarded by a Rule

To Whom It May Concern,

I have reviewed the Draft Programmatic Environmental Impact Statement(DPEIS) "for accomplishing civilian nuclear energy R&D and isotopeproduction missions in the United States." Although the report makes norecommendations, I believe it is clear that the United States must have a reliable source from which these isotopes may be procured. I believethe only way to insure this is to manufacture them within the UnitedStates. Further, I believe that the Fast Flux Test Facility located atHanford, WA would be ideal for production of these isotopes. Thefacility is fairly new, has an excellent safety record, and has the bestcapabilities, in both equipment and personnel, to accomplish the mission.

Louis E. McMurray  
 3441 N. Prescott Place  
 Tucson, AZ 85750  
 520\_296\_2137

571-1

**Response to Commentor No. 571**

571-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

***Commentor No. 572: Joanna Panter***

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From: Joanna Panter  
[SMTP:JPANTER@EARTHLINK.NET]  
Sent: Saturday, September 02, 2000 3:41:40 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: FFTF  
Auto forwarded by a Rule

PLEASE RESTART FFTF!

The isotopes that could be produced there are the same ones that saved myuncle's life, and my grandmother's. I want them to be available to everyonewhose cancer could benefit from this treatment. Everyone wants to find a "cure for cancer" and these isotopes are a major part of this research. Dowhat is right for people with cancer and forget about ancient fears ofanything connected to the word "nuclear."

572-1

***Response to Commentor No. 572***

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572-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

***Commentor No. 573: Kristina Lestik***


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From: Kristina.Lestik@directory.reed.edu%internet  
[SMTP:KRISTINA.LESTIK@DIRECTORY.REED.EDU]  
Sent: Saturday, September 02, 2000 3:43:13 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: Portland DOE public forum on the FFTF  
Auto forwarded by a Rule

To whom this may concern:

I recently attended the DOE public discussion In Portland, OR aboutpossibly re\_opening the FFTF nuclear reactor, and although I had to depart earlyand so was unable to comment at the meeting, I would like to offer some commentsby email, (and this was the email address I found provided in your literature).

I would first like to thank the DOE for their efforts in creating a calm andcoherent meeting for the discussion to take place, and I was quite sorry to seethat all other attendees did not respect their efforts. I would also like to saythat, as a person residing in Portland, OR, I do highly support the reopening ofthe FFTF: it seems the most cost efficient alternative, and I do not feel that its operation would jeopardize my safety or living conditions in any way.

Thank you for your time!

\_Kristina Lestik

573-1

573-2

***Response to Commentor No. 573***

**573-1:** DOE notes the commentor's remarks concerning the Portland, Oregon public hearing.

**573-2:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

***Commentor No. 574: Randy Black***

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From: randy black[SMTP:RANDOO1@HOME.COM]  
Sent: Saturday, September 02, 2000 4:55:07 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: FFTF  
Auto forwarded by a Rule

I support the restart of the FFTF Reactor Facility at Hanford to meet the national needs for medical isotopes and other peaceful nuclear materials. The FFTF is the most economical, safe, and environmental friendly method available to meet these needs.

Thank you,

Randy Black

**574-1**

***Response to Commentor No. 574***

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**574-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

**Commentor No. 575: Paige Knight  
Hanford Watch**

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From: paige s knight[SMTP:PAIGEKNT@JUNO.COM]  
 Sent: Saturday, September 02, 2000 5:01:56 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: Fw: [hanfordwatch] Who will decide?  
 Auto forwarded by a Rule  
 \_\_\_\_\_ Forwarded message \_\_\_\_\_  
 From: William Kinsella <kinsella@lclark.edu>  
 To: "Hanford Watch mailing list" <hanfordwatch@telelists.com>  
 Date: Sat, 2 Sep 2000 10:32:32 \_0700 (PDT)  
 Subject: [hanfordwatch] Who will decide?  
 Message\_ID:  
 <LYRIS\_22536\_88394\_2000.09.02\_10.33.53\_\_paigeknt#juno.com  
 @telelists.com>

On page S\_2 of the PEIS cost study there's an interesting sentence:

"The programmatic decisions to be made in connection with the NIPEIS are the responsibility of the DOE Office of Nuclear Energy, Science and Technology"

How does that sentence fit with the idea that the Secretary of Energy will make the final decision before leaving office? Will the decision be made at the level of the Secretary, or at the level of the Nuclear Energy program office?

Bill

You are currently subscribed to hanfordwatch as:  
 paigeknt@juno.com  
 To unsubscribe send a blank email to  
 leave\_hanfordwatch\_22536l@telelists.com

575-1

**Response to Commentor No. 575**

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**575-1:** The sentence identified by the commentor was paraphrased from Section 1.3 of the Draft NI PEIS that inadvertently resulted in altering the intended meaning of the sentence. That sentence reads, "The programmatic decisions reached in association with this NI PEIS will address isotope production and civilian nuclear energy research and development missions which are the responsibility of the DOE Office of Nuclear Energy, Science and Technology." In response to the commentor, it is the Secretary of Energy who will make the decision with respect to the alternatives presented in this NI PEIS to accomplish the stated mission objectives. Decisions made will be published in the Record of Decision no sooner than 30 days after publication of the EPA Notice of Availability for this NI PEIS.

### ***Commentor No. 576: Alfred A. Brooks***

From: Alfred A. Brooks[SMTP:BROOKS@ICX.NET]  
 Sent: Saturday, September 02, 2000 7:41:19 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: Comments on PEIS  
 Auto forwarded by a Rule

Also attached as an MSWORD 6.0/95 RTF file.

August 30, 2000

Ms. Colette E. Brown  
 US Department of Energy  
 19901 Germantown Road  
 Germantown, MD 20874  
 Via E\_mail

Dear Ms. Brown

I would like to make the following comments on the Draft PEIS for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions? [DOE/EIS 03100 July 2000]:

1) The choice of the alternatives is strongly dependent on the projected isotope usage and the projected level of isotope use is at variance with other recent projections of use. Also, it is contradictory to the recent DOE decision to terminate the production of stable isotopes by the Y<sub>12</sub> calutrons some of which are necessary as feedstock to a radiation facility. The calutrons were said to be shut down due to lack of product demand. The PEIS should be augmented to explain these apparently contradictory courses of action.

2) In the absence of the stable isotopic feedstock from the calutrons, there should be some discussion in the PEIS of alternative feedstocks, their availability and their cost.

576-1

### ***Response to Commentor No. 576***

- 576-1:** DOE notes the commentor's concern. The calutrons at Oak Ridge National Laboratory produce electromagnetically enriched stable isotopes. These isotopes, in turn, are used to produce radioisotopes that are used for medical applications. Only Russia has a similar, large-scale facility with this capability. Although the ORNL calutron facilities have only operated intermittently over the past several years, DOE's existing stable isotope inventory is extensive and will supply the projected five-year demand for most stable research isotopes. DOE is currently in the process of designing a new stable enrichment unit whose capacity could be altered in the future to meet increases in demand.
- 576-2:** PEIS Section 2.3.1.1.3 and the separate cost report both state that there would be no cost for this German MOX fuel. The fuel would be reconfigured into assemblies suitable for irradiation at FFTF before shipment to the United States. The only cost attributed to the German MOX fuel is its transportation from a U.S. port to FFTF. PEIS Appendix J, Section J.3.6 discusses the history, availability, compatibility, and conversion of the unused German SNR-300 MOX fuel, which is currently in storage at Dounreay, Scotland.
- 576-3:** A determination of whether or not the wastes generated from the processing of neptunium-237 targets exhibit a hazardous waste characteristic under the Resource Conservation and Recovery Act would be made after its generation. If the waste is considered mixed waste, it will be managed in accordance with both the applicable hazardous waste and radioactive waste requirements. The Waste Isolation Pilot Plant (WIPP) has a RCRA permit and can accept mixed and nonmixed transuranic waste for disposal, not high-level radioactive waste.
- 576-4:** The facilities and locations evaluated in this NI PEIS, and for which costs are presented in the Cost Report, represent a range of reasonable alternatives for accomplishing the specified missions. Under Alternative 2, DOE's use of existing irradiation facilities (e.g., HFIR and ATR) as currently configured to accomplish the specified mission requirements would be limited by the requirement that such use would be on a not-to-interfere basis so as to not impact existing and ongoing research and isotope production activities at the facilities. However, as discussed in Volume 1, Sections 2.5.3 and 2.6.1, HFIR and ATR could not fully meet the projected long-term needs for medical isotope production and nuclear research and development, with or without adding the plutonium-238



**Commentor No. 576: Alfred A. Brooks (Cont'd)**

3) There is anticipated use of the German MOX fuel for the FFTF but there is no discussion of the methods, facilities and costs of preparing suitable FFTF fuel elements clad in stainless steel from the German supplies. At the same time the problems of the disposal of the mixed high level wastes resulting from the presence of chromium in the stainless steel which is classified as a hazardous material not eligible for WIPP disposal. These questions should be addressed in the PEIS.

576-2

4) After these questions are resolved, the PEIS should contain a total cost comparison of meeting as much as possible of the projected needs by fully utilizing the capacity of the enhanced HFIR and the ATR (with the installation of a hydraulic loader similar to HFIR). This cost should be compared to the cost of starting up FFTF and its associated chemical processing facilities including the full costs of contaminating new buildings and refurbishing old equipment. This comparison will shed light on the advisability of committing to the larger projected demands at this time.

576-3

576-4

I believe that it will be very important to base any comparison to the total life cycle costs of the possible alternatives and to clearly define the stability of any feed stocks that are not entirely within our control. I strongly favor utilizing inexpensive foreign sources as long as there is some certainty of their reliability. Thank you for providing the opportunity of making comments on this proposal.

Sincerely,  
Alfred A. Brooks

Men are never so likely to settle a question rightly as when they discuss it freely." \_ Thomas Babington, Lord Macaulay  
Southey's Colloquies on Society (1830)

"The only thing necessary for evil to prevail is for good men to do nothing." \_ Edmund Burke (attributed)

**Response to Commentor No. 576**

production mission or with power level upgrades. As discussed in Section 2.3.1.2 of this NI PEIS, a rabbit system has been proposed for ATR to be used to enhance the production of commercial quantities of short-lived radioisotopes. However, no decision has been made on this upgrade, which would be paid for by the ATR privatization contractor and not DOE. Therefore, this possible enhancement does not affect the evaluation of current facility capabilities for meeting mission requirements and has not been considered in the Cost Report.

The neptunium-237 inventory is sufficient to support the plutonium-238 production requirement over 35 years, as evaluated in this NI PEIS. Availability of feedstock for currently envisioned medical, research, and industrial isotope production has been considered (see Appendix C of the NI PEIS), with the costs of procuring feedstock for isotope target fabrication included in the annual operating costs of the alternatives as compiled in the Cost Report.

DOE could purchase plutonium-238 from Russia to satisfy its responsibility to supply NASA with the necessary fuel to support future space exploration missions. Under the current contract set to expire in 2002, the United States is authorized to purchase up to 40 kilograms of plutonium-238, with the total available for purchase in any one year limited to 10 kilograms. However, DOE does not stockpile large quantities of Russian plutonium-238 long in advance of needs due to the additional processing, at an additional cost of approximately 1/3 of the original cost of production, that would be required to remove decay products that occur following extended storage of the material. To date, DOE has purchased approximately 9 kilograms of plutonium-238 under this contract. Future purchases from Russia would require the negotiation of a new contract with Russia.

***Commentor No. 577: Sally Light***

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From: Sally Light[SMTP:SALLIGHT1@EARTHLINK.NET]  
Sent: Saturday, September 02, 2000 6:21:16 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: Attn: Colette E. Brown \_ Public Comment on Pu 238  
Production PEIS  
Auto forwarded by a Rule

September 2, 2000

Colette E. Brown  
U.S. Department of Energy  
Nuclear.Infrastructure\_PEIS@hq.doe.gov

Re: Public Comment on Draft Programmatic Environmental Impact  
Statement(PEIS) re: Department of Energy's (DOE) Plan to  
Expand Production ofPlutonium 238 (Pu 238) for Future Space  
Missions

Dear Ms. Brown,

I am writing on behalf of Nevada Desert Experience, a non\_profit,  
faith\_based, anti\_nuclear organization that has existed for 20 years,  
and that has a readership of about 4,500 people around the nation  
andthe world.

Although we are primarily concerned with the ongoing underground  
?subcritical? nuclear tests that are being conducted at the Nevada  
TestSite as well as the above\_ground ?subcritical? tests being done  
at theLos Alamos National Laboratory, we are also a part of the  
Abolition 2000Global Network to Abolish Nuclear Weapons and the  
US Campaign to AbolishNuclear Weapons, both of which oppose  
the entire nuclear cycle,including nuclear power. We believe that all  
nuclear technology,including nuclear power/fuel, is inherently  
dangerous, posing anunacceptable risk to all life on the planet.

***Response to Commentor No. 577***

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**Commentor No. 577: Sally Light (Cont'd)**

We at Nevada Desert Experience ask that DOE consider only non\_nuclear technologies for powering future space missions/projects for the following reasons, among others:

1. The production of nuclear power is a messy operation that endangers the workers, the environment and the public health & safety. This was documented in the 1980s by the General Accounting Office (GAO) in a film the GAO produced as a report to Congress on the conditions inside US nuclear facilities nationwide. Technology used to produce nuclear power/fuel has not become safer since that film report was produced, and, certainly, no substantive ground has been gained since then as to how to deal adequately with the problems of the safe handling of radioactive materials in general.
2. The rockets that are used to launch space technology have an unacceptably high failure rate ? 10% or more ? so that using nuclear power as fuel, especially since the US intends to expand the number of such launches, raises the risk of widespread radioactive contamination in the case of rocket failure. Remember, all isotopes of Plutonium are so deadly that a single speck inhaled will lodge in the lung tissue where it will stay, emitting powerful alpha radiation, and the individual is very likely to develop cancer at sometime in his/her life. Radioactive impacts are now known to not only cause cancer, but also cause genetic mutations and genomic instability ? so a single rocket failure could be responsible for a worldwide plutonium exposure that will have devastating results.
3. The PEIS names three possible DOE facilities for the production of Pu238: Oak Ridge, Hanford and INEEL, all of which are already extremely contaminated Nuclear Weapons Complex sites. It would be better to develop non\_nuclear technology (e.g., solar\_powered fuel source) in an entirely new, uncontaminated facility, while seeing to the environmental cleanup of these three labs, and others (see #4 below).

577-1

577-2

**Response to Commentor No. 577**

**577-1:** The commentor's opposition to nuclear technology for space applications is noted. DOE also notes the commentor's interest in alternative energy sources, although issues of research and development of alternative energy sources are beyond the scope of this NI PEIS. The missions to be addressed in this PEIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

**577-2:** DOE notes the commentor's opposition to NASA's use of nuclear materials for space missions, concern for the adequacy of ongoing cleanup activities, and concern over the use of nuclear power in space based weapons. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. These radioisotope power systems have been used for almost 40 years, and have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. NASA establishes the need and requirements for space missions and undergoes a thorough NEPA evaluation for each launch. None of the DOE missions stated in the NI PEIS are defense- or weapons-related.

The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. DOE activities associated with this program would not impact the schedule or available funding for existing cleanup activities at proposed sites for implementation of the nuclear infrastructure alternatives.

### ***Commentor No. 577: Sally Light (Cont'd)***

4. The costs associated with the expanded Pu 238 production are too exorbitant to be reasonable. Historically, environmental cleanup of contaminated sites (including sites contaminated by radioactive wastes) has always been extremely underfunded in the US. For instance, the cleanup budget for Lawrence Livermore National Laboratory (LLNL) has usually been a mere 1% of LLNL's total budget ? the other 99% has gone for weapons work ? and this is just one such example of DOE's priority setting over the years. DOE would do better by developing non\_nuclear technology for space launch fuel needs, and use the saved funding for cleanup of its labs, many of which are Superfund sites (i.e., ranked as among the most contaminated in the nation).

577-3

5. We are concerned about the future uses of nuclear power in space. We have in our possession the document signed by the Joint Chiefs of Staff, "Vision 2020," which clearly shows the goal of using nuclear power to gain military control of the planet from space, as well as being in the business of space\_based warfighting. If space\_based technology must happen, it should be non\_nuclear based, and it should be for peaceful purposes.

577-2

We hope that you will give serious attention to these comments. If there are any questions, please do not hesitate to reach me at my home (510) 527\_2057, or by return email.

Sincerely,

Sally Light  
Executive Director  
Nevada Desert Experience

P.O. Box 7849  
Oakland, CA 94601  
Email: sallight1@earthlink.net

### ***Response to Commentor No. 577***

577-3: DOE notes the commentor's opinion.

**Commentor No. 578: Tanja Winter**

From: Tanja Winter[SMTP:TANJA@CTS.COM]  
 Sent: Saturday, September 02, 2000 8:01:12 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: no plutonium iin space  
 Auto forwarded by a Rule

Colette E. Brown, U.S. Department of Energy,  
 Dear Ms. Brown,

Urge you NOT allow expansion of plutonium production for future spacemissions. The danger to population and the planet are too great to proceed.No further NASA flights should be permitted until alternative fuels replaceplutonium.

**578-1**

NASA is not doing enough to develop alternative (solar) power sourcesfor space missions. European Space Agency (ESA) has now developedhigh\_efficiency solar cells for deep space missions.

The plutonium production/fabrication process for space nuclear powermissions has recently led to several worker contamination accidents. Anexpansion of production will only worsen this problem.

**578-2**

Expanding the number of launches of nuclear powered space devices fromCape Canaveral on rockets with 10% failure rates will only increase thepossibility of a deadly mishap.

**578-1**

The massive cost of expanded production of plu\_238 can not be justifiedat a time when DoE admits it needs over \$300 billion to clean\_up existingproblems at DoE facilities.

**578-3**

The military should not be promoting the use of nuclear power in space forspace\_based weapons technology. Using nuclear power for space war will have severe environmental implications for life on Earth. Department of Energy should not be involved in weapons production.

**578-4**

Tanja Winter, 8315 Paseo Del Ocaso, La Jolla, CA 932037

**Response to Commentor No. 578**

**578-1:** DOE notes the commentor's concern for NASA's use of nuclear materials for space missions and interest in the development of alternative energy sources for space missions, although issues such as NASA research priorities are beyond the scope of this NI PEIS. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. These radioisotope power systems have been used for almost 40 years, and have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. NASA establishes the need and requirements for space missions and undergoes a thorough NEPA evaluation for each launch. None of the missions stated in the NI PEIS are defense- or weapons-related.

**578-2:** Plutonium-238 processing facilities can be safely operated to support the nuclear infrastructure missions described in Section 1.2 of Volume 1. Sections 4.2-4.6 of Volume 1 provide the results of the evaluation of potential health impacts that would be expected to result from plutonium-238 processing, including normal operations and a spectrum of accidents that included severe accidents. The environmental analysis showed that the radiological and nonradiological risks associated with plutonium-238 processing would be small.

**578-3:** DOE notes the commentor's opinion and concern about funding available for cleanup at DOE facilities.

**578-4:** DOE notes the commentor's concern over the use of nuclear power in space-based weapons. The scope of this NI PEIS is limited to analysis of alternatives to fulfill the requirements of the DOE missions, which include the production of medical and industrial isotopes, the production of plutonium-238 for NASA missions, and civilian nuclear energy research and development. None of these DOE missions is defense- or weapons-related.

***Commentor No. 579: Julia Hamrick***

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From: HamricksJD@aol.com%internet  
[SMTP:HAMRICKSJD@AOL.COM]  
Sent: Sunday, September 03, 2000 8:48:53 AM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: Operation of FFTF  
Auto forwarded by a Rule

To Whom it May Concern:

Although I have no specific comments on the PEIS related to operation of FFTF, I would like to strongly encourage DOE to get off the fence, and get on with a decision related to operation of FFTF. DOE has squandered many opportunities to make beneficial use of such a magnificent engineering tool as FFTF. It seems to me it is now or never. Get on with making good use of the facility in a way that benefits people everywhere.

Julia Hamrick  
1108 Avalon Lane  
Anniston, AL 36207

**579-1**

***Response to Commentor No. 579***

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**579-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.

**Commentor No. 580: *mpdragonfly@aol.com***

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From: MPDRAGONFLY@aol.com%internet  
[SMTP:MPDRAGONFLY@AOL.COM]  
Sent: Sunday, September 03, 2000 12:42:51 PM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Subject: (no subject)  
Auto forwarded by a Rule

"PLEASE RESTART THE FFTF"

It's helped people in my family, please help us share the  
technology and save lives.

580-1

**Response to Commentor No. 580**

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**580-1:** DOE notes the commentor's support for Alternative 1, Restart FFTF.



### ***Commentor No. 581: Sidney J. Goodman***

From: Sidney J. Goodman  
[SMTP:SJGDESIN@MINDSPRING.COM]  
Sent: Sunday, September 03, 2000 11:15:49 AM  
To: INFRASTRUCTURE\_PEIS, NUCLEAR  
Cc: Sidney J. Goodman; Global Network Against Weapons &  
Nuclear Power in Space  
Subject: Stop making more Plutonium 238  
Auto forwarded by a Rule

To: Collette E. Brown

Too much has been risked already by using Plutonium\_238 in space missions. Further production of this deadly poison must be halted.

581-1

NASA isn't doing what it should to develop alternative energy sources for space missions. It has fallen behind the European Space Agency in this respect.

Contamination accidents with Pu\_238 have already happened. The only way to end further incidents is to stop further usages.

An increased number of space missions using PU\_238, increases the probability that the unthinkable widespread contamination will really happen.

The cost of these missions is not justified. Using several cheap smaller probes (like we did for the Mars Explorer mission), instead of fewer expensive large probes, is stupid.

581-2

Further PU\_238 missions increase the probability of space based nuclear warfare. The horror of it all is incomprehensible.

NASA has told outrageous lies in their assurances that the unthinkable widespread dispersion of PU\_238 can never occur. Officials who participated in this fraud should be imprisoned.

### ***Response to Commentor No. 581***

**581-1:** DOE notes the commentor's concern for NASA's use of nuclear materials for space missions and interest in the development of alternative energy sources for space missions, although issues such as NASA research priorities are beyond the scope of this PEIS. NASA establishes the need and requirements for space missions and undergoes a thorough NEPA evaluation for each launch. Plutonium-238 sources are used only when they enable the mission or enhance mission capabilities.

Potential health and safety impacts associated with normal operations, facility accidents, and transportation as a result of the proposed production of plutonium-238 are relatively low and are discussed in detail in Chapter 4 of Volume 1 and appendixes H, I, and J of Volume 2 in the Final NI PEIS. For over 30 years, radioisotope power systems have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. However, potential health and safety impacts associated with future launches of spacecraft utilizing plutonium-238 are not within the scope of the NI PEIS analysis, but would be addressed in the specific NEPA documentation prepared by NASA in support of such missions.

**581-2:** DOE notes the commentor's opposition to NASA's use of nuclear materials for space missions. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. These radioisotope power systems have been used for almost 40 years, and have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. NASA establishes the need and requirements for space missions and undergoes a thorough NEPA evaluation for each launch. None of the missions stated in the NI PEIS are defense- or weapons-related.



***Commentor No. 581: Sidney J. Goodman (Cont'd)***

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One bad accident, which is waiting to happen, will justify a widespread demand for huge cuts in the NASA budget. I will participate in that demand.

581-2  
(Cont'd)

Angrily,

Sidney J. Goodman, P.E., M.S.M.E.  
170 Villanova Drive  
Paramus, NJ 07652

***Response to Commentor No. 581***

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## Commentor No. 582: Marcy Stamper

From: Marcy Stamper[SMTP:MSTAMPER@POP.NWLINK.COM]  
 Sent: Sunday, September 03, 2000 3:41:02 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Subject: Hanford and FFTF restart  
 Auto forwarded by a Rule

Dear Ms. Brown:

It is scandalous that DOE would consider restarting FFTF and producing moreradioactive materials when they have yet to deal with the serious hazardsposed by Hanford's status as the EPA's biggest Superfund site. Containersare already leaking into the environment, endangering local residents aswell as people across the country through contamination of agriculturalareas and the Columbia River and salmon runs. The recent fire at Hanford is further proof of the dangers lurking, as well as the contempt for publicand worker health exemplified by DOE's initial denials of any radiation'sescaping into the environment during the fires.

I demand that DOE responsibly clean up the radioactive contamination andput the health of the public and the environment first, and not create anymore deadly isotopes.

Marcy Stamper

582-1

582-2

## Response to Commentor No. 582

**582-1:** DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**582-2:** DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing activities to remediate existing contamination at Hanford are high priority to DOE. The Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The proposed activities delineated in the NI PEIS would not have an impact on Hanford cleanup activities. The potential health and environmental impacts associated with operation of the Hanford facilities during normal operations and from postulated accidents are presented in Section 4.3 of the draft NI PEIS. All impacts to human health and to ecological resources would be small in the immediate area and negligible at all distant locations.

No radioactive materials were "released" in the Hanford Wildfires of 2000. Wildfires did resuspend some materials already in the environment. The resuspended materials were low, slightly above natural background levels. The low levels required several days of analysis to quantify.

No food or water restrictions are in place outside the Hanford Reservation as a result of Hanford activities.

DOE worker and public health and safety are of paramount and primary importance to DOE.

**Commentor No. 583: Joan M. Brown**


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From: Joan M Brown[SMTP:JOANKANSAS@JUNO.COM]  
 Sent: Sunday, September 03, 2000 8:27:19 PM  
 To: INFRASTRUCTURE\_PEIS, NUCLEAR  
 Cc: globalnet@mindspring.com%internet  
 Subject: Citizen concerns on Draft Programatic  
 Environmental Impact Statement  
 Auto forwarded by a Rule

Colette E. Brown  
 U.S. Department of Energy  
 NE\_50, 19901 Germantown Road,  
 Germantown, MD 20874\_1290

Dear Mr. Brown,

Peace this day! I am writing about my concerns for the ongoing use and investigation into possible sources for nuclear energy for missions to space. It seems that there are other alternatives which are not being considered with enough seriousness.

My understanding is that it is possible to develop alternative solar power sources for missions to space, and that in fact, highly efficient solar cells for deep space missions have been developed by the European Space Agency (ESA). In this age of global cooperation it seems to our advantage to collaborate with the Europeans on such technology. This would be more cost effective and also eliminate the possibility of worker contamination accidents and help reduce our existing difficulty with how to deal with the long term effects upon our environment around nuclear energy, production and waste.

With the current rate of 10% failure rate on rockets from Cape Canaveral, it seems that we are playing with fire to expand the number of launches that will be nuclear powered. Possible mishaps, as you know have irreversible consequences and are not good for the future of your program or our planet.

**Response to Commentor No. 583**


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583-1

**583-1:** DOE notes the commentor's concern for NASA's use of nuclear materials for space missions and interest in the development of alternative energy sources for space missions, although issues such as NASA research priorities are beyond the scope of this NI PEIS. Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. These radioisotope power systems have been used for almost 40 years, and have repeatedly demonstrated their performance, safety, and reliability in various NASA space missions. NASA establishes the need and requirements for space missions and undergoes a thorough NEPA evaluation for each launch. None of the missions stated in the NI PEIS are defense- or weapons-related.

***Commentor No. 583: Joan M. Brown (Cont'd)***

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Finally the cost of expanded production of plu\_238 cannot be justified ata time when DoE admits it needs over \$300 billion to clean\_up existingwaste problems at facilities.

**583-2**

Thank you for your cosideration of these concerns. I would very muchlike to hear your responses.

Sincerely,

Joan Brown, osf  
2340 Turk Blvd.  
San Francisco, CA 94118

***Response to Commentor No. 583***

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**583-2:** DOE notes the commentor's opinion and concern about funding available for cleanup at DOE facilities.